



Deposition of:
Kristi Good

August 17, 2020

In the Matter of:

**Estate of Andrew Davis Good v.
Rodriguez-Santana, Barbara**

Veritext Legal Solutions

888.777.6690 | cs-midatlantic@veritext.com | 215-241-1000

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA

3 - - -

4 ESTATE OF ANDREW DAVIS :
5 GOOD, :
6 :
7 Plaintiff, :
8 :
9 v. : DOCKET NO. 20-1431
10 :
11 BARBARA RODRIGUEZ-SANTANA, :
12 LANCASTER COUNTY, :
13 CHRISTOPHER LEPLER, :
14 BOROUGH OF EPHRATA, :
15 :
16 Defendants. :

17 - - -

18 Monday, August 17, 2020

19 - - -

20 Oral Deposition of KRISTI GOOD, held in
21 the Law Offices of MAC MAIN LAW GROUP, LLC, located
22 at 433 West Market Street, Suite 200, West Chester,
23 Pennsylvania, commencing approximately at 10:05 a.m.
24 on the above date before Holly J. Cross, a
 Registered Professional Reporter and Notary Public.

 - - -

 VERITEXT LEGAL SOLUTIONS
 MID-ATLANTIC REGION
 1801 Market Street, Suite 1800
 Philadelphia, Pennsylvania 19103

Page 2

1 APPEARANCES:

2

3 LAW OFFICES OF ERIC A. SHORE, P.C.
BY: GRAHAM BAIRD, ESQUIRE
4 Two Penn Center
1500 John F. Kennedy Boulevard, Suite 1240
5 Philadelphia, PA 19110
(215) 627-9999
6 GrahamB@EricShore.com
Counsel for Plaintiff

7

8

9 MAC MAIN LAW GROUP, P.C.
BY: DAVID J. MAC MAIN, ESQUIRE
BY: ANDREW DAVIS, ESQUIRE
10 433 West Market Street, Suite 200
West Chester, PA 19382
11 (484) 318-7106
DMacMain@MacMainLaw.com
12 Counsel for Defendants
Barbara Gunnett, Lancaster County, Christopher
13 Leppler

14

15 MARSHALL, DENNEHEY, WARNER, COLEMAN & GOGGIN
BY: CHRISTOPHER P. BOYLE, ESQUIRE
16 2000 Market Street, Suite 2300
Philadelphia, PA 19103
17 (215) 575-4555
CPBoyle@mdwecg.com
18 Counsel for Defendant
Borough of Ephrata

19

20 ALSO PRESENT:

21 Barbara Gunnett

22

23

24

Page 4

1 DEPOSITION SUPPORT INDEX

2

3 INSTRUCTION NOT TO ANSWER:

4 Page Line

5 (None)

6

7 REQUEST FOR PRODUCTION OF DOCUMENTS:

8 Page Line Description

9 (None)

10

11 STIPULATIONS:

12 Page Line

13 5 1

14

15 QUESTIONS MARKED:

16 Page Line

17 (None)

18

19

20

21

22

23

24

Page 3

1 INDEX

2 ---

3 Testimony of: KRISTI GOOD

4 By Mr. MacMain.....5, 87

5 By Mr. Boyle.....79

6

7

8 EXHIBITS

9 ---

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

NUMBER	DESCRIPTION	PAGE
Good Exhibit 1	Complaint	29

Page 5

1 (It is hereby stipulated and

2 agreed by and among counsel for the

3 respective parties that reading, signing,

4 sealing, certification and filing are

5 waived and that all objections, except as

6 to the form of the question, be reserved

7 until the time of trial.)

8 ---

9 KRISTI GOOD, having been duly sworn, was

10 examined and testified as follows:

11 ---

12 EXAMINATION

13 BY MR. MAC MAIN:

14 Q Could you please state your full name for

15 the record?

16 A Kristi Ann Good.

17 Q Kristi, my name is David MacMain. I

18 represent the Lancaster County Sheriff's Department

19 and Deputy Gunnett in this case, and I'm going to

20 ask you some questions here, what's called a

21 deposition. Have you ever had your deposition taken

22 before?

23 A No.

24 Q Okay. How do you prefer that I call you?

KRISTI GOOD

<p style="text-align: right;">Page 6</p> <p>1 Kristi? Ms. Good?</p> <p>2 A Kristi is fine.</p> <p>3 Q Okay. So, Kristi, as I'm sure your</p> <p>4 counsel has explained to you, a deposition is a</p> <p>5 question-and-answer session. I'm going to ask you</p> <p>6 questions about you, about your son, about the</p> <p>7 incident, what information you have about the</p> <p>8 lawsuit, damages, and so forth. This is not like</p> <p>9 TV. I'm not trying to trick you. I just want to</p> <p>10 know what information you can provide to me related</p> <p>11 to the claims as well as the damages that you're</p> <p>12 seeking.</p> <p>13 If at any time I ask you a question that</p> <p>14 doesn't make sense, if I talk like a lawyer and I</p> <p>15 use terms that normal people don't use, let me know,</p> <p>16 and I'll rephrase it. I want you to understand the</p> <p>17 questions I'm asking you.</p> <p>18 All your answers have to be verbal. So</p> <p>19 this young lady to my right and to your left is</p> <p>20 taking down everything that's said. So in ordinary</p> <p>21 conversation, if I ask you a question and you shrug</p> <p>22 your shoulders or nod your head, I kind of know what</p> <p>23 you mean, but she can't take that down. It's got to</p> <p>24 be a verbal answer, so make sure all your answers</p>	<p style="text-align: right;">Page 8</p> <p>1 needs to be clarified or changed or added to or you</p> <p>2 realize an answer you had given me previously was</p> <p>3 incorrect, just let me know, and we'll let you put</p> <p>4 on the record what needs to be changed or added to</p> <p>5 or corrected from a prior answer. Okay?</p> <p>6 A Yes.</p> <p>7 Q Okay. The final thing, as I said, all</p> <p>8 your answers do have to be verbal. So even if like</p> <p>9 just now you shook your head yes, I knew you meant</p> <p>10 yes, but the court reporter needs to be able to</p> <p>11 record it.</p> <p>12 Do you have any questions of me before we</p> <p>13 begin?</p> <p>14 A No.</p> <p>15 Q And I probably should have asked: Have</p> <p>16 you ever been deposed before?</p> <p>17 A No.</p> <p>18 Q And I think I did ask that in the</p> <p>19 beginning. Okay.</p> <p>20 A Yes.</p> <p>21 Q And I'll try not to repeat a question. I</p> <p>22 apologize.</p> <p>23 Prior to filing this lawsuit, what</p> <p>24 information did you know about what happened with</p>
<p style="text-align: right;">Page 7</p> <p>1 are verbal.</p> <p>2 The other thing that's unlike normal</p> <p>3 conversation is you need to let me finish my</p> <p>4 question before you begin your answer, and I'll let</p> <p>5 you finish your answer before I begin my next</p> <p>6 question, because the court reporter can only take</p> <p>7 one of us down at a time.</p> <p>8 A Okay.</p> <p>9 Q So we'll try not to talk over one</p> <p>10 another.</p> <p>11 If at any point in time you need a break,</p> <p>12 need some fresh air, need a drink, need to use the</p> <p>13 restroom, let me know, and we'll accommodate you. I</p> <p>14 don't think we'll be terribly long. I would</p> <p>15 estimate an hour to two hours maybe; but if you feel</p> <p>16 you need to break for any reason, say so. The only</p> <p>17 exception is if I ask a question, you have to answer</p> <p>18 it before we take a break, because I assume you're</p> <p>19 going to want to talk to your counsel during breaks.</p> <p>20 So we can't leave if there's a question pending.</p> <p>21 If at any point during the deposition you</p> <p>22 realize an answer you had given me earlier in the</p> <p>23 deposition, whether it be the prior question or an</p> <p>24 hour earlier, is incorrect in any way, something</p>	<p style="text-align: right;">Page 9</p> <p>1 the incident in which your son died? Either from</p> <p>2 talking to people, from reading the newspaper, or</p> <p>3 from any source whatsoever, what information did you</p> <p>4 have about what had happened?</p> <p>5 A Well, I heard the scanner going, so I</p> <p>6 went out to the hospital. I got stopped by fire</p> <p>7 police. I got boxed in, and I heard over the</p> <p>8 scanner, "DOA has been found. Should we bring him</p> <p>9 in like a sack of -- should I carry him like a sack</p> <p>10 of potatoes, or is somebody going to come help me</p> <p>11 bring him in?"</p> <p>12 After that I went -- they had me go to</p> <p>13 the police in the hospital.</p> <p>14 Q Okay.</p> <p>15 A And they said that this looks like a</p> <p>16 complete accident. They have to investigate, and</p> <p>17 they apologized, and then they had us go to the</p> <p>18 police barracks for four hours.</p> <p>19 Q Okay.</p> <p>20 A And then after I seen the DA, I got to --</p> <p>21 at the DA I seen the video. I got to see her tase</p> <p>22 my son numerous times.</p> <p>23 Q Okay.</p> <p>24 A I saw him fall down the hill. I didn't</p>

KRISTI GOOD

<p style="text-align: right;">Page 10</p> <p>1 understand, and I heard from the DA different 2 stories, so I didn't know what was what yet, but I 3 kept watching that video, and it just -- just seeing 4 him get -- keep getting tased, and it didn't make 5 sense to me. 6 Q Okay. So let me break some of that down. 7 So you said that you heard over the scanner what you 8 heard. Do you know who said -- who was speaking on 9 the scanner? 10 A No. It's a scanner that's online. It 11 just said that a prisoner escaped Ephrata Hospital. 12 Q And you actually heard that as that was 13 being broadcast? 14 A Yes. 15 Q And did you know at that point it was 16 your son that was fleeing from them? 17 A No. 18 Q Okay. Had your son fled from the police 19 before? 20 A Yes. 21 Q How many times had he run from the police 22 when he was being arrested prior to this instance? 23 A I only know of one. 24 Q And what was the other one that you know</p>	<p style="text-align: right;">Page 12</p> <p>1 Q As his mother you told him, "Hey, not a 2 good idea if you're being arrested to run from the 3 police"? 4 A Yes. 5 Q Okay. Did you tell him as his mother, 6 "Hey, not a good idea if you're being arrested not 7 to fight with the police"? 8 A Yes. 9 Q And what was his response when you told 10 him those things? 11 A He was -- he had a lot of problems. He 12 was -- had drug problems, so he didn't say much, and 13 I can't remember every response he told me. I'm 14 sorry. I can't. 15 Q Okay. I'm not asking for every response. 16 It's a pretty simple -- 17 A Yes, but I -- I just -- since -- I don't 18 know what he said, and I don't want to make 19 something up I do not know. 20 Q That's fine. So you had those 21 conversations with him prior to this incident that 22 it's not a good idea to run from the police when 23 you're being arrested? 24 A Yes, I had that.</p>
<p style="text-align: right;">Page 11</p> <p>1 of? 2 A It was like a year prior. 3 Q Did he jump into the same creek during 4 that prior escape attempt? 5 A It was at a different area where it was 6 only like three inches. It was on the other side. 7 Q Right, but he had escaped -- prior to 8 this incident, jumped into the same creek and was 9 able to escape; correct? 10 A I don't know exactly how it happened. I 11 was not there. 12 Q Okay. After that incident did you ever 13 tell your son, "Hey, you probably shouldn't run from 14 the police if you're being arrested"? 15 A Yes. 16 Q And what was his response? 17 A He knows. 18 Q Okay. So he knew better, that when 19 you're being arrested, you should cooperate and not 20 run from the police? 21 A Yes, but -- 22 MR. BAIRD: Object to the form, but you 23 can answer. 24 BY MR. MAC MAIN:</p>	<p style="text-align: right;">Page 13</p> <p>1 Q And you don't know what his response was? 2 A No. 3 Q And you told him between that prior 4 incident when he ran from the police and ran into 5 the same creek and escaped not a good idea to fight 6 with the police? 7 A Yes. 8 Q Okay. And you don't know what his 9 response was? 10 A No. 11 Q Okay. 12 A Well, I do remember one thing. I 13 remember him telling me he would never go in a creek 14 again, because he was terrified, because even though 15 the water was so low, the rapids were pulling him 16 under, and he was terrified for his life. That, I 17 do remember. 18 Q Okay. Let me ask you about -- he was 19 arrested prior to the incident at the hospital; 20 correct? 21 A Correct. 22 Q Have you read any of the reports from 23 what he said or did or what the officer said and did 24 for that arrest?</p>

KRISTI GOOD

<p style="text-align: right;">Page 14</p> <p>1 A I read some of them, but I was not there, 2 so I cannot -- I was taking my mom home when he got 3 arrested, so I cannot comment on that. 4 Q Have you spoken to anybody who was 5 present during that arrest? 6 A Yes. 7 Q Who have you spoken with? 8 A My fiancé, Officer Rogers, and one of my 9 neighbors. 10 Q Okay. And who's your fiancé? 11 A Brian Whitman. 12 Q Okay. Brian was present when he was 13 arrested? 14 A But they didn't see the actual -- he was 15 in the house. He heard the commotion. He ran out 16 and ran across the street and seen him being tackled 17 and put in the handcuffs. 18 Q Okay. So Brian your -- let me just 19 finish. Brian your fiancé saw him running from the 20 police? 21 A Yes. 22 Q Okay. Did he see what initially 23 happened? 24 A Right.</p>	<p style="text-align: right;">Page 16</p> <p>1 A No. 2 Q Okay. So you spoke to your fiancé. What 3 he told you was he saw Andrew running from the 4 police -- 5 A Yes. 6 Q -- and the police tackle him? 7 A Yes. 8 Q Okay. Anything else that your fiancé 9 saw? 10 A He said he saw a bunch of Tasers. 11 Q Okay. Where was -- your fiancé, I'm 12 sorry, his name is? 13 A Brian Whitman. 14 Q Brian -- last name is what? 15 A Whitman. 16 Q Where was Brian located while he was 17 witnessing this? 18 A He was in the house coming out. 19 Q The house where Andrew was being arrested 20 or a different house? 21 A At our house. 22 Q Okay. And where was Andrew when he was 23 arrested? 24 A Over at the apartments somewhere next</p>
<p style="text-align: right;">Page 15</p> <p>1 Q And then he sees as -- did he go by 2 Andrew or Andy? 3 A Andrew. 4 Q As Andrew was running from the police, 5 the police tackled him. That's what your fiancé 6 saw? 7 A Yes. 8 Q Okay. You said that one of your 9 neighbors also saw some part of the -- and the 10 arrest I'm talking about very specifically happened 11 on April 15th, 2018. It looks like around -- 12 sometime in the late afternoon. He was going to -- 13 A That's wrong. 14 MR. BAIRD: Just wait for him to ask a 15 question and then answer. Just one at a time. 16 THE WITNESS: Sorry. 17 BY MR. MAC MAIN: 18 Q Okay. The police reports indicate that 19 he was being arrested about 4:30 in the afternoon by 20 Ephrata and Akron, so I just want to make sure we're 21 talking about the same incident; correct? 22 A Yes. 23 Q Okay. And you didn't witness any of this 24 arrest?</p>	<p style="text-align: right;">Page 17</p> <p>1 door. 2 Q So Andrew lived at a different place than 3 you and your fiancé Brian lived? 4 A Yes. He was staying over there because I 5 wouldn't... 6 Q He was staying there because you didn't 7 want him living with you? 8 A At that time, yes. 9 Q And why didn't you want him living with 10 you? 11 A Because I knew he was -- he left -- I was 12 mad at him for leaving rehab early. I wanted him to 13 finish his rehab. 14 Q Sorry. Just give me one second. 15 Okay. Are you okay to continue? If at 16 any point you need to take a break because it gets 17 emotional, just say so. Okay? 18 So Andrew was in rehab prior to this 19 incident? 20 A Yes. 21 Q And what was he in rehab for? 22 A For his drug abuse of heroin and I don't 23 know what else. 24 Q Where was he in rehab?</p>

KRISTI GOOD

<p style="text-align: right;">Page 18</p> <p>1 A I don't remember the place. I know it 2 was two hours away. I don't remember what it was 3 called. 4 Q Okay. 5 A It was set up through the jail. 6 Q Okay. And was this in relation to a 7 prior arrest of some sort? It was a condition that 8 he get rehab? 9 A Yes. 10 Q Okay. And he was supposed to be at this 11 facility, but he left before his time was up? 12 A Yes. 13 Q And how did you know that he had left? 14 Did he come back to the house or... 15 A My ex-husband picked him up and dropped 16 him off close to my house, so he knocked on my door 17 to grab some clothes and stuff. 18 Q And your ex-husband is also Andrew's 19 father? 20 A Yes. 21 Q And what's his name? 22 A Robert Good. 23 Q How close in time to this incident, the 24 April 14th incident, did Andrew leave the rehab</p>	<p style="text-align: right;">Page 20</p> <p>1 Q Okay. And what did Brian tell you that 2 he saw? 3 A That he just saw that there was Tasers in 4 the back, and he went over so he could get Andrew's 5 stuff. When he was arrested, Andrew gave him his 6 wallet and his belongings that were on him. 7 Q Okay. 8 A And that was -- and they were taking him 9 to the hospital. 10 Q Okay. And you said -- regarding this 11 arrest you also said there was a neighbor that 12 witnessed some of it? 13 A Yes. 14 Q And who was that? 15 A Shawn Newell. 16 Q Shawn? 17 A Newell. 18 Q N-E-W-E-L-L? 19 A Yes, and Beth, but I don't know her last 20 name. 21 Q And what did Shawn tell you he witnessed 22 regarding the arrest? 23 A Basically the same thing that Brian did, 24 and Beth said that he was up on the porch when the</p>
<p style="text-align: right;">Page 19</p> <p>1 facility? 2 A Not even a week. 3 Q Okay. So he comes, he gets dropped off 4 at your house, and you don't want him living there 5 because you're mad at him that he left rehab? 6 A Yes. 7 Q So who was he living with at the time of 8 the incident? 9 A I can't answer that. He was friends with 10 everybody in the apartment over there. 11 Q So he was living with somebody. You 12 don't even know who he was living with. 13 A Right. 14 Q Okay. So getting back to the arrest, you 15 said that Brian witnessed him running from the 16 police, the police arresting him, and you said there 17 were some Tasers used? 18 A Yes. 19 Q And how far away was Brian when he was 20 witnessing this arrest? 21 A I don't know. I wasn't there. 22 Q But was he on, like, the porch of your 23 apartment? 24 A I don't know. I really don't.</p>	<p style="text-align: right;">Page 21</p> <p>1 cops got there, and they chased him down. 2 Q Okay. Well, he ran, and they chased him; 3 right? 4 A Yeah. 5 Q Okay. And then you said there was -- was 6 there anyone else who witnessed any part of the 7 arrest? 8 A No. 9 Q Okay. Do you know what he was arrested 10 for? 11 A Leaving the rehab early. 12 Q And that would have been a violation of 13 his probation? 14 A Correct. 15 Q And in terms of what happened inside the 16 hospital, you weren't present for that? 17 A No. 18 Q And in terms of him running from law 19 enforcement, particularly Deputy Sheriff Gunnett in 20 the hospital parking lot, you didn't witness any of 21 that? 22 A No. I got to see it on video. 23 Q Okay. But you didn't witness what had 24 happened?</p>

KRISTI GOOD

<p style="text-align: right;">Page 22</p> <p>1 A No.</p> <p>2 Q Have you spoken to anybody who actually</p> <p>3 did witness him running from the sheriff's deputy in</p> <p>4 the parking lot?</p> <p>5 A I talked to people that were there that</p> <p>6 night. I don't know if they actually witnessed</p> <p>7 that. I talked to a fireman that was -- that was at</p> <p>8 Lincoln Fire Company. I also talked to one of</p> <p>9 Andrew's ex-girlfriends, who happened to be a</p> <p>10 rescuer, and her name is Jess. And they told me</p> <p>11 that everything was a disaster. They acted like he</p> <p>12 was a piece of crap, that nobody acted professional</p> <p>13 about any of it.</p> <p>14 Q Okay. So what did Jess witness?</p> <p>15 A Jess was the one that helped pull him out</p> <p>16 of the water.</p> <p>17 Q Okay. So she --</p> <p>18 A She witnessed him coming out with four</p> <p>19 Tasers in him. Out of the creek, he had four Tasers</p> <p>20 when he was pulled out.</p> <p>21 Q And what's Jess's last name?</p> <p>22 A I do not know offhand. I'm sorry.</p> <p>23 Q Okay. And who is Jess? Jess is a friend</p> <p>24 of Andrew's?</p>	<p style="text-align: right;">Page 24</p> <p>1 Q Does Jess -- this rescue, where she</p> <p>2 worked for some -- like a volunteer fire company</p> <p>3 or --</p> <p>4 A Yes.</p> <p>5 Q Okay. Does she work in law enforcement?</p> <p>6 A No.</p> <p>7 Q Has she ever worked in law enforcement to</p> <p>8 your knowledge?</p> <p>9 A No.</p> <p>10 Q And these other folks you spoke with who</p> <p>11 said things weren't done right, any of them work in</p> <p>12 law enforcement?</p> <p>13 A Well, I did talk to one person that was</p> <p>14 there.</p> <p>15 Q Okay.</p> <p>16 A And that was Officer Schmidt.</p> <p>17 Q Schmidt. Okay. And what did Officer</p> <p>18 Schmidt tell you?</p> <p>19 A I spoke to him when I got to the police</p> <p>20 station. He said this was a big mistake. He must</p> <p>21 have fell or slipped.</p> <p>22 Q Okay.</p> <p>23 A And I said, "What happened?"</p> <p>24 He said, "It was an accident."</p>
<p style="text-align: right;">Page 23</p> <p>1 A One of his ex-friends, but's she's a</p> <p>2 rescuer.</p> <p>3 Q Okay.</p> <p>4 A She works for the rescue. She was on the</p> <p>5 boat.</p> <p>6 Q Okay. Jess didn't witness, though,</p> <p>7 Andrew fleeing from the law enforcement; correct?</p> <p>8 A Correct.</p> <p>9 Q And she didn't witness anything that</p> <p>10 happened as to how he went in the water and while he</p> <p>11 was in the water; only she helped recover his body</p> <p>12 afterwards.</p> <p>13 A Correct.</p> <p>14 Q You had mentioned some other people. Did</p> <p>15 any of the people that you mentioned during your</p> <p>16 prior answer actually witness any part of what</p> <p>17 happened with the flight from the sheriff's deputy?</p> <p>18 A I don't know offhand. I can't say yes or</p> <p>19 no.</p> <p>20 Q Did any of the people that you spoke with</p> <p>21 witness any of what happened at the creek other than</p> <p>22 pulling the body out of the water?</p> <p>23 A Not that I know of. I think they got</p> <p>24 there afterwards.</p>	<p style="text-align: right;">Page 25</p> <p>1 And that's all he said.</p> <p>2 Q Okay. Do you know if Officer Schmidt</p> <p>3 witnessed Andrew going into the water?</p> <p>4 A I don't know.</p> <p>5 Q Okay. Have you ever worked in law</p> <p>6 enforcement?</p> <p>7 A No.</p> <p>8 Q Do you have any family members that have</p> <p>9 ever worked in law enforcement?</p> <p>10 A No.</p> <p>11 Q Have you used or been around a Taser?</p> <p>12 A No.</p> <p>13 Q Have you ever been tasered?</p> <p>14 A No.</p> <p>15 Q What about Brian? What does Brian do for</p> <p>16 a living?</p> <p>17 A He does side jobs of construction and so</p> <p>18 forth.</p> <p>19 Q Okay. Has Brian ever worked in law</p> <p>20 enforcement?</p> <p>21 A No.</p> <p>22 Q How about your ex-husband, Robert Good?</p> <p>23 A No.</p> <p>24 Q Okay. Anything else prior to filing the</p>

KRISTI GOOD

<p style="text-align: right;">Page 26</p> <p>1 lawsuit that you knew or heard about the incident?</p> <p>2 Either the arrest with Ephrata and Akron, what</p> <p>3 happened at the hospital inside, or what happened</p> <p>4 with Andrew's fleeing from Deputy Sheriff Gunnett,</p> <p>5 or at the creek, any one of those four things, any</p> <p>6 other information you had prior to filing suit?</p> <p>7 A Well, I'm trying to remember. I did go</p> <p>8 to the DA's Office.</p> <p>9 Q Okay.</p> <p>10 A We got to watch a couple of videos.</p> <p>11 Q Okay.</p> <p>12 A And I talked to an officer, and the one</p> <p>13 officer told me that, "You're not supposed to tase</p> <p>14 anybody that's in handcuffs and shackles," first of</p> <p>15 all.</p> <p>16 And when I seen that video, it didn't</p> <p>17 make sense why she didn't reach out and grab him.</p> <p>18 When she was going down the hill, she was only this</p> <p>19 much away from him when he fell. And if you</p> <p>20 watch -- I watched the video at least a hundred</p> <p>21 times, so I know she could have reached and grabbed</p> <p>22 him. It made no sense why she tased him again and</p> <p>23 didn't grab him and save his life instead of --</p> <p>24 sorry -- instead of tasing him again.</p>	<p style="text-align: right;">Page 28</p> <p>1 than two Tasers, because the x-rays from the</p> <p>2 hospital, they had all the Tasers out of him from</p> <p>3 the other day. So when he got to her, that's when</p> <p>4 the Tasers started.</p> <p>5 And how did them four Tasers get in him?</p> <p>6 I know that hospital to that creek, because I used</p> <p>7 to swim in that creek. I know the area. The two</p> <p>8 Tasers there, he had to get to the woods. He was</p> <p>9 less than three to four feet from the creek. The</p> <p>10 two Tasers got tased there.</p> <p>11 Q Well, that's what you believe. Do you</p> <p>12 have any witnesses that saw that?</p> <p>13 A I've got proof from the autopsy.</p> <p>14 Q My question very simply is: Do you have</p> <p>15 any evidence other than your theory that he was</p> <p>16 tasered at the creek?</p> <p>17 A No, I don't.</p> <p>18 Q Have you had any experts look at this to</p> <p>19 determine that the factual evidence doesn't add up</p> <p>20 to what is in the reports from everybody that was</p> <p>21 present at the creek?</p> <p>22 A I haven't.</p> <p>23 Q Do you know of anybody who has?</p> <p>24 A I don't know if my lawyer has or not.</p>
<p style="text-align: right;">Page 27</p> <p>1 Q Okay. He continued to run, though;</p> <p>2 correct? After that.</p> <p>3 A Yeah, but she could have reached out</p> <p>4 three times. How can you run -- his hands were like</p> <p>5 this (indicating).</p> <p>6 Q Well, let me ask you this: Do you blame</p> <p>7 your son for running from the police, that part of</p> <p>8 this was his fault?</p> <p>9 A No, I don't.</p> <p>10 Q No? Is it okay to run from the police?</p> <p>11 A No.</p> <p>12 Q Okay. And in terms of what happened at</p> <p>13 the creek in terms of how he went and what happened,</p> <p>14 you don't have any knowledge whatsoever, do you?</p> <p>15 A No.</p> <p>16 Q Have you read any of the reports --</p> <p>17 A Yes, I have.</p> <p>18 Q -- from the people that were present?</p> <p>19 Okay. Did you see any person in any of those</p> <p>20 reports from what happened at the creek, did anybody</p> <p>21 Taser him while he was in the creek?</p> <p>22 A Not -- I didn't read that exact thing,</p> <p>23 but I did see the autopsy where he was brought out</p> <p>24 of the thing with four Tasers, so somebody shot more</p>	<p style="text-align: right;">Page 29</p> <p>1 MR. MAC MAIN: Okay. I'm going to show</p> <p>2 you what we're going to mark as Good 1.</p> <p>3 (Good Exhibit 1 was marked for</p> <p>4 identification.)</p> <p>5 BY MR. MAC MAIN:</p> <p>6 Q Kristi, I've put in front of you a copy</p> <p>7 of the complaint or what starts the lawsuit. Have</p> <p>8 you seen this before?</p> <p>9 A No.</p> <p>10 Q Have you seen anything like this that</p> <p>11 lays out the -- what's alleged to have happened and</p> <p>12 what the claims are and...</p> <p>13 A Oh, yes.</p> <p>14 Q Okay.</p> <p>15 A Yeah, I've seen this part.</p> <p>16 Q Okay. What you're pointing to are the</p> <p>17 pages -- the actual complaint, not the cover sheets</p> <p>18 that go with the complaint?</p> <p>19 A Yes, I've seen this.</p> <p>20 Q Okay. So I want to ask you about a few</p> <p>21 things that you have in the complaint. If you</p> <p>22 turn -- let me ask you this: When you reviewed it,</p> <p>23 was everything in there that's factual in nature --</p> <p>24 I'm not talking about the legal wording, but the</p>

KRISTI GOOD

<p style="text-align: right;">Page 30</p> <p>1 factual averments, did you believe they were all 2 true when you filed this? 3 A Yes. 4 Q And that's based on what you told me you 5 knew about the incident and didn't know about the 6 incident? 7 A Yes. 8 Q Okay. If you turn to paragraph number 9 18 -- okay. Paragraph 18 says, "At all times 10 material hereto, Defendants knew or otherwise had 11 notice of his opioid addiction due to his past 12 criminal history and current fugitive status as of 13 April 14, 2018." 14 I want to ask you very specifically about 15 Deputy Sheriff Gunnett. Do you believe she knew 16 that he had an opioid addiction? 17 A That, I can't answer. 18 Q Okay. And do you know if she knew 19 anything at all about your son's past criminal 20 history? 21 A Yes, I believe she did. 22 Q And why do you believe she knew about his 23 past criminal history? 24 A Because they usually look before coming</p>	<p style="text-align: right;">Page 32</p> <p>1 Q But you have no idea who the person was, 2 what their background -- 3 A I don't remember. I'm sorry. 4 Q Okay. The reason I'm asking -- and let 5 me finish my question -- is people have all kinds of 6 theories about all kinds of things, and I'm trying 7 to figure out if it's someone that actually knows 8 what they're talking about or has any credentials or 9 whether it's just somebody commenting. 10 So you don't know who wrote this article, 11 just that somebody said on some article you saw 12 online that you're not supposed to Taser somebody 13 who's on opioids. 14 A Right. 15 Q Okay. 16 A Yeah. I Googled laws on tasing, and 17 that's how I got it. 18 Q Okay. Paragraph 20, "During his arrest 19 of April 14, 2018, Plaintiff was tased and/or shoved 20 and held upon the ground without good reason or 21 lawful justification." 22 That was the arrest that we talked about 23 which prompted him then being taken to the hospital; 24 correct?</p>
<p style="text-align: right;">Page 31</p> <p>1 over. 2 Q Do you have any information that she knew 3 anything or had any prior encounters at all with 4 your son? 5 A Not that I know of. 6 Q Okay. And the opioid addiction, why is 7 his opioid addiction -- why is that important in 8 your view for this incident? 9 A Because part -- when I was reading 10 different things, you're not supposed to tase 11 anybody on opiates, and you're also -- it also puts 12 their mental state in a whole different situation. 13 Q Where did you read that you're not 14 supposed to tase somebody on opioids? 15 A Online. 16 Q Online, what -- 17 A Under Tasers. 18 Q Okay. And do you know who wrote this 19 article? Was it someone -- 20 A I don't know. 21 Q Okay. So you read online an article that 22 says that -- whoever the author was said you're not 23 supposed to tase somebody on opioids. 24 A Correct.</p>	<p style="text-align: right;">Page 33</p> <p>1 A Yes. 2 Q Okay. And what's the basis that he was 3 shoved or tasered without good reason or lawful 4 justification? What's that mean? 5 A The way I understand by the three people 6 that had seen it, they said they already had him 7 down. They scraped his face against the cement. 8 They shoved him, and three more officers -- after he 9 was already down, after he was already in 10 handcuffs -- jumped on top of him, and he was tased 11 while he was already down. 12 Q Okay. This is what Shawn, Beth, and 13 Brian told you? 14 A Yes. 15 Q Where was Shawn located in relation to 16 what was happening? 17 A He was over -- Andrew ran over to the 18 park, and that's where the arrest took place, and 19 they both ran over when they heard Andrew scream. 20 And they were both telling him, "That's 21 enough. That's enough." 22 Q Do you know who Denny is? Is there a guy 23 Denny that would have witnessed some of this? 24 A Denny?</p>

KRISTI GOOD

<p style="text-align: right;">Page 34</p> <p>1 Q And if you don't, there's a Denny 2 mentioned in one of the reports. That's why I was 3 asking -- 4 A I don't know. 5 Q -- maybe you know who that person is. 6 Okay. 7 And did Shawn and Beth and Brian tell you 8 that your son was fighting with the officers after 9 he ran from them? 10 A He said -- they said he did try to get 11 away from them, yes. 12 Q Okay. In terms of -- I'm going to jump 13 ahead to the hospital. So he's taken to the 14 hospital where he gets, I guess, some kind of 15 treatment. Have you spoken to anybody at the 16 hospital about his conduct or his behavior while at 17 the hospital? 18 A Yes. I talked to Officer Rogers, who 19 took him, and Officer Stone, and they both said he 20 was in a great mood. Matter of fact, they were 21 telling me he was joking around with them. They 22 both knew Andrew, and they said he was in good 23 spirits. He didn't want to go back to jail, but he 24 still was joking around with them.</p>	<p style="text-align: right;">Page 36</p> <p>1 Q Okay. You said -- 2 A And Stone told me he was in good spirits 3 up until -- towards the sheriff when she was taking 4 him to x-ray. 5 Q Did they each also tell you that he 6 didn't want to go to prison? 7 A Oh, yeah, he didn't want to go to prison. 8 We all know that. Who does? 9 Q Okay. In terms of -- I'm going to jump 10 ahead now to the parking lot. Okay? 11 A Okay. 12 Q So all you know is -- everything you know 13 about what happened in the parking lot and the creek 14 is what you've told me already; correct? 15 A Correct. 16 Q Okay. 17 A All but one thing. I don't know if this 18 matters or not. Maybe I shouldn't say nothing. Why 19 would she park two parking lots down with all the 20 law enforces pulled right up to the door? And why 21 wouldn't she put him right in the car? She stood 22 outside for three minutes talking to him. 23 Q Do you know what the conversation was? 24 A No, but he -- when an officer arrests</p>
<p style="text-align: right;">Page 35</p> <p>1 Q Okay. So let me break that down. So you 2 spoke to Stone. When did you speak to Officer 3 Stone? 4 A Actually just a couple of weeks ago, and 5 I just wanted to know what Andrew's last words were 6 before anything happened. 7 And his words were like, "He was great. 8 He was joking around about how he got -- he was off 9 drugs for a little, but he had to get out of there, 10 because of slipping up and this and that, and that 11 he was bigger," and just -- just talking. 12 Q Okay. 13 A Just joking around and Officer Rogers I 14 talked to right after, like two weeks after, because 15 my daughter tried to kill herself after her 16 brother's death, and Rogers had to come out to check 17 on her. 18 Q And what did Rogers tell you? 19 A The same thing. I mean, he didn't want 20 to go to jail. But once they got to the hospital, 21 they were watching TV and joking around until Stone 22 got there. That's Andrew. Once he's calmed down 23 he'll joke with you. He didn't fight with them at 24 all there at the hospital.</p>	<p style="text-align: right;">Page 37</p> <p>1 somebody, they're supposed to put them right in the 2 car. Both officers I talked to told me that, and 3 the DA told me that at the DA's meeting. They don't 4 understand why she parked down there and why she 5 didn't put him straight in the car. 6 Q Okay. So let me ask you a question: 7 Have you read the reports as to what happened while 8 they're outside the car? 9 A I did not get them. I got -- I just got 10 told by the DA's that there was a lot of little 11 mistakes, but little mistakes you can't get -- you 12 can't get in trouble for. So she made tons of 13 little mistakes, and my son's dead now. 14 Q Do you think your son made any little 15 mistakes? 16 A Oh, yeah, but not enough to kill him. 17 Q Well, let me ask you this with the creek: 18 You've read the reports. Everyone said he jumped 19 into the creek himself; correct? 20 A No. 21 Q No? Did you see anybody that said he 22 was -- 23 A Yeah, the DA, he told me -- 24 MR. BAIRD: Hold on.</p>

KRISTI GOOD

<p style="text-align: right;">Page 38</p> <p>1 THE WITNESS: Sorry.</p> <p>2 MR. BAIRD: Let him ask his question.</p> <p>3 BY MR. MAC MAIN:</p> <p>4 Q Tell me what evidence you had that he</p> <p>5 went into the creek other than by himself.</p> <p>6 A At the DA's Office they all told me he</p> <p>7 backed in; and then when I went to Officer Schmidt</p> <p>8 who was there that night, he told me it was a</p> <p>9 complete accident.</p> <p>10 Q So my question was: Is there any person,</p> <p>11 any evidence whatsoever that you have from any</p> <p>12 witness that your son went into the creek with the</p> <p>13 help of anyone else other than himself?</p> <p>14 A I believe that he went into the creek</p> <p>15 with help with the Taser, because there was four</p> <p>16 Tasers.</p> <p>17 Q That's what you said you believe, but I'm</p> <p>18 asking for evidence. You have to have evidence, if</p> <p>19 you bring a suit, to sustain it. So my question is:</p> <p>20 What evidence do you have that anybody other than</p> <p>21 your son jumped in the creek all by himself?</p> <p>22 A I have the words from other officers</p> <p>23 that's saying it was -- that he did not.</p> <p>24 Q Well, you said other officers said it was</p>	<p style="text-align: right;">Page 40</p> <p>1 A He wouldn't have.</p> <p>2 Q Well, he jumped into the creek a few</p> <p>3 months before this trying to --</p> <p>4 A That was --</p> <p>5 Q Let me finish. He's run from the police</p> <p>6 before, and he's jumped into that very creek before.</p> <p>7 So my question is: Why wouldn't he do this same</p> <p>8 thing again if he successfully got away the first</p> <p>9 time he did it?</p> <p>10 A Because he was terrified. He told at</p> <p>11 least eight of us he was terrified of that -- the</p> <p>12 current pulling him down, that he would never go in</p> <p>13 the creek again because the current killing him.</p> <p>14 Q When he went to rehab, did he tell you</p> <p>15 that he was never going to use drugs again?</p> <p>16 A He said he was working on it.</p> <p>17 Q And when he left the rehab facility, he</p> <p>18 shouldn't have done that either; correct?</p> <p>19 A Correct.</p> <p>20 Q Had he never left the rehab facility,</p> <p>21 none of this would have happened; correct?</p> <p>22 A Yes, I guess.</p> <p>23 Q Had he not gotten himself arrested, none</p> <p>24 of this would have happened; correct?</p>
<p style="text-align: right;">Page 39</p> <p>1 an accident; right?</p> <p>2 A Yes.</p> <p>3 Q Did they say he accidentally went in</p> <p>4 himself or somebody accidentally pushed him or...</p> <p>5 A At that point they told me they were</p> <p>6 investigating it more.</p> <p>7 Q Okay. You said someone told you that</p> <p>8 your son backed into the creek; correct?</p> <p>9 A Correct.</p> <p>10 Q Did anybody say that he backed in by</p> <p>11 somebody pushing him?</p> <p>12 A No.</p> <p>13 Q So as I understand it, you have no</p> <p>14 evidence whatsoever that your son went into the</p> <p>15 creek other than on his own?</p> <p>16 A Yeah, I guess.</p> <p>17 Q Okay. Paragraph 26 of your complaint, it</p> <p>18 says, "Plaintiff ran towards Cocalico Creek and upon</p> <p>19 information and belief entered the water" -- and we</p> <p>20 already established you have no evidence that he</p> <p>21 went into the water other than on his own; correct?</p> <p>22 A Yes.</p> <p>23 Q Do you know he would have jumped into the</p> <p>24 creek by himself?</p>	<p style="text-align: right;">Page 41</p> <p>1 A Yes.</p> <p>2 Q Had he not ran from the sheriff's deputy,</p> <p>3 none of this would have happened; correct?</p> <p>4 A Yes.</p> <p>5 Q Had he not jumped into the creek, none of</p> <p>6 this would have happened; correct?</p> <p>7 A Yes.</p> <p>8 Q Okay. So I'm going to go to the next</p> <p>9 part of paragraph 26. It says, "Upon information</p> <p>10 and belief, he was tased multiple times by Defendant</p> <p>11 Santana and other John Doe Defendants while in the</p> <p>12 creek."</p> <p>13 I think I already asked you: You have no</p> <p>14 witnesses to support that. You just believe that</p> <p>15 because you think there were too many Taser probes;</p> <p>16 correct?</p> <p>17 A Yes.</p> <p>18 Q Okay. And who do you think tasered him</p> <p>19 multiple times?</p> <p>20 A Well, I know she did for a fact, Officer</p> <p>21 Santana, because I seen it on TV.</p> <p>22 Q Sure. That was the video he was running</p> <p>23 from the parking lot and went down that hill;</p> <p>24 correct?</p>

KRISTI GOOD

<p style="text-align: right;">Page 42</p> <p>1 A Correct.</p> <p>2 Q And your criticism is that she should</p> <p>3 have grabbed him rather than tasered him?</p> <p>4 A Yeah. He was right in front of her.</p> <p>5 Q Okay.</p> <p>6 A If she would have grabbed him, he would</p> <p>7 still be alive.</p> <p>8 Q Well, let's say -- let's take that.</p> <p>9 Okay? Had he not continued to run he'd still be</p> <p>10 alive; correct?</p> <p>11 A I don't know. I can't say that.</p> <p>12 Q Okay. Well, had she grabbed him, you</p> <p>13 think he would still be alive, so you believe that,</p> <p>14 but had he not run he'd still be alive; correct?</p> <p>15 A I don't know.</p> <p>16 Q Had he not jumped in the creek, he'd</p> <p>17 still be alive; correct?</p> <p>18 A I can't say that.</p> <p>19 Q Okay. So you believe -- your theory is</p> <p>20 that he was tased while he was in the creek because</p> <p>21 you saw that he had been tasered earlier; correct?</p> <p>22 A (No audible response.)</p> <p>23 Q Yes?</p> <p>24 A Yes.</p>	<p style="text-align: right;">Page 44</p> <p>1 creek?</p> <p>2 A No.</p> <p>3 Q Have you read the reports of multiple</p> <p>4 officers who said that they actually went into the</p> <p>5 creek at risk of their own life to try to save your</p> <p>6 son?</p> <p>7 A Yeah, eight minutes after he went in.</p> <p>8 And I also read her report where she watched him bob</p> <p>9 up and down three and four times till he stopped</p> <p>10 coming up. Why wouldn't she jump in and save him?</p> <p>11 Q My question is: Did you read officers at</p> <p>12 the risk of their own life jumped into the creek to</p> <p>13 try to save your son from his own decision to jump</p> <p>14 in the creek?</p> <p>15 MR. BAIRD: Object to the form.</p> <p>16 You can answer.</p> <p>17 MR. MAC MAIN: Let me rephrase it.</p> <p>18 BY MR. MAC MAIN:</p> <p>19 Q You read reports where officers at risk</p> <p>20 of their own life jumped into the creek to try to</p> <p>21 save your son; correct?</p> <p>22 A Yes.</p> <p>23 Q And, in fact, you thanked some of those</p> <p>24 officers since this incident, haven't you?</p>
<p style="text-align: right;">Page 43</p> <p>1 Q Okay. In terms of very specifically,</p> <p>2 what evidence or facts do you have that he was</p> <p>3 tasered while he was in the creek?</p> <p>4 A I don't have any, but I have...</p> <p>5 Q I think I asked you this before, but let</p> <p>6 me be certain: You've read some of the reports</p> <p>7 regarding the incident; correct?</p> <p>8 A Correct.</p> <p>9 Q Okay. Have you read the reports of</p> <p>10 Officer Rivera from Ephrata?</p> <p>11 A Yes.</p> <p>12 Q You read her report where she said nobody</p> <p>13 tasered him when he was in the creek; correct?</p> <p>14 A Yes.</p> <p>15 Q Have you read the report of the hospital</p> <p>16 security guy, whose name is --</p> <p>17 A I did not get anything from him.</p> <p>18 Q Okay. Simo, Corey Simo, S-I-M-O. Did</p> <p>19 you read anything where he said that your son wasn't</p> <p>20 tasered when he was in the creek, he drowned all by</p> <p>21 himself? Did you read that report?</p> <p>22 A No.</p> <p>23 Q Have you read the report of anybody who</p> <p>24 said that your son was tasered while he was in the</p>	<p style="text-align: right;">Page 45</p> <p>1 A Yes.</p> <p>2 Q Okay. How many officers have you</p> <p>3 thanked?</p> <p>4 A One.</p> <p>5 Q And who was that?</p> <p>6 A I think it was Cruz.</p> <p>7 Q Officer Cruz?</p> <p>8 A I believe so.</p> <p>9 Q Do you remember speaking to a Detective</p> <p>10 Graham Quinn and a Detective Shepherd shortly after</p> <p>11 this incident?</p> <p>12 A Yeah. They were at the DA's Office.</p> <p>13 Q Do you remember anything about the</p> <p>14 conversation?</p> <p>15 A Yeah. At that point in time I was so</p> <p>16 confused by everything they were saying. That was</p> <p>17 only a week and a half after my son died. Yes, I</p> <p>18 thanked them for trying to save him, but at that</p> <p>19 time my mind was everywhere.</p> <p>20 Q Do you recall telling them that you</p> <p>21 thought your son was suicidal?</p> <p>22 A No, I did not say that. I said I called</p> <p>23 the hospital and told them please -- I asked to talk</p> <p>24 to him. "Please take care of him," because I was</p>

KRISTI GOOD

<p style="text-align: right;">Page 46</p> <p>1 afraid of what the officers were going to do to him 2 after what I heard about my house. 3 So I told them, "Please watch out for 4 him," is what I told the nurse. 5 Q You recall telling them that someone told 6 you their -- your son told the police just to kill 7 him? 8 A No, that, I don't recall. 9 Q Do you recall talking to an Officer 10 Michelle Cook and saying she -- that you wanted to 11 pass along your thanks for helping to try to save 12 your son? 13 A When I heard officers went in, the ones 14 that actually went in the water and tried to save 15 him, I was thankful, because at least somebody tried 16 to save him. 17 Q Okay. Next paragraph in your complaint, 18 number 27, it says, "Upon information and belief, 19 Mr. Good was tased causing him to fall unconscious 20 in the creek while shackled where he then drowned." 21 Same question as the prior one: Do you 22 have any evidence whatsoever of that? 23 A No. 24 Q In terms of -- I'm going to kind of jump</p>	<p style="text-align: right;">Page 48</p> <p>1 and he also does construction for him. 2 Q And you said you were engaged? 3 A Yes. 4 Q And when do you -- I guess in this crazy 5 time, is there a date for the marriage? 6 A No. 7 Q In terms of the estate, have you been 8 appointed as the administrator? 9 A Yes. 10 Q And when was that? 11 A Like a month after he died or two. His 12 dad signed everything over to me. 13 Q Sure. And as I understand, Andrew was 14 never married? 15 A No. 16 Q No children? 17 A No. 18 Q And what did the estate consist of? What 19 were the assets, and what were the debts? 20 A I don't think he even had assets. 21 Q Okay. I thought I saw something in the 22 answers to discovery where he had a \$7,000 medical 23 bill of some sort? 24 A That was his burial.</p>
<p style="text-align: right;">Page 47</p> <p>1 off for a second. In terms of assets, do you own a 2 home? 3 A No. 4 Q What assets do you have? Do you have any 5 assets? A bank account? 6 A Yeah, I have a savings account. 7 Q Are you employed currently? 8 A No, I'm on disability. 9 Q Okay. And what are you on disability 10 for? 11 A When I was working as a flagger, I got 12 hit by a drunk driver, and I broke my back in four 13 different places. 14 Q And how long have you been on disability? 15 A Since 2007. 16 Q Other than your bank account, do you have 17 any other assets? 18 A No. 19 Q Where you currently reside, that's a 20 rental property? 21 A Yes. 22 Q Okay. What about Brian? Is Brian 23 employed? Your fiancé. 24 A He works for an Amish man as a driver,</p>	<p style="text-align: right;">Page 49</p> <p>1 Q Okay. Were there any other debts, credit 2 cards, any other debts other than -- 3 A Yeah, he had a hospital -- a couple of 4 hospital bills, and he had -- what was -- he had 5 fines that I was paying on him -- for him. 6 Q That was for the criminal cases? 7 A Yeah. 8 Q And you were paying it? 9 A When he wasn't working, yes. 10 Q Okay. Was he employed at the time of the 11 incident? 12 A No, because he just got out of rehab. He 13 was employed at Specialty Bakery for a while, but 14 then they burned down. That was prior to him being 15 in trouble. 16 Q Okay. What was the longest he ever held 17 a job? 18 A Specialty Bakery was a couple of months, 19 so I don't know exactly. I would say about four 20 months. 21 Q And when was that in relation to this 22 incident? 23 A About a year or two ago. 24 Q Okay. Other than the two or four</p>

KRISTI GOOD

<p style="text-align: right;">Page 50</p> <p>1 months --</p> <p>2 A It was like four to five months, I'd say.</p> <p>3 Q Four to five. Okay.</p> <p>4 A He worked through a temp service.</p> <p>5 Q Other than that job were there any other</p> <p>6 jobs that he held for more than a month?</p> <p>7 A No. He did temp jobs off and on.</p> <p>8 Q Okay.</p> <p>9 A He was getting better, though. He was</p> <p>10 going to see a counselor.</p> <p>11 Q Was that before he fled from the rehab</p> <p>12 facility he was seeing a counselor?</p> <p>13 A Yes, and when he came home and he was</p> <p>14 trying to find -- the reason he left the rehab</p> <p>15 facility is because somebody snuck heroin in, and he</p> <p>16 didn't want to take a chance of relapsing. That's</p> <p>17 why he left.</p> <p>18 Q That's what he told you?</p> <p>19 A And I checked with the rehab, and the</p> <p>20 rehab had five other incidents where people were</p> <p>21 bringing drugs in. I can't prove that particular</p> <p>22 day, but there was other incidents of that</p> <p>23 particular place having drugs brought in.</p> <p>24 Q How many rehab facilities had your son</p>	<p style="text-align: right;">Page 52</p> <p>1 Q Okay. Is that affiliated with White</p> <p>2 Deer?</p> <p>3 A Yeah, that's what White Deer Run is.</p> <p>4 Q Okay. How many times had he been</p> <p>5 incarcerated at Lancaster County Prison?</p> <p>6 A I don't know exactly.</p> <p>7 Q Was it more than once?</p> <p>8 A Yes.</p> <p>9 Q And do you know what he was incarcerated</p> <p>10 for, what the crimes were?</p> <p>11 A One was for trespassing.</p> <p>12 Q And where was he when he was trespassing?</p> <p>13 A I don't remember. I think it was -- what</p> <p>14 was it? One, I think, was like a -- it was a</p> <p>15 misdemeanor theft, but I -- theft by deception or</p> <p>16 something, but I don't remember them all. Sorry.</p> <p>17 Q And the theft by deception, was that</p> <p>18 also -- and we'll go through it in more detail, but</p> <p>19 were any of Andrew's crimes, were you also charged</p> <p>20 with the same crime at the same time?</p> <p>21 A Was I?</p> <p>22 Q Yeah.</p> <p>23 A No.</p> <p>24 Q No?</p>
<p style="text-align: right;">Page 51</p> <p>1 been at other than this one prior to this incident?</p> <p>2 A One when he was 15, and one in -- he was</p> <p>3 at three other ones.</p> <p>4 Q Did he complete any of them?</p> <p>5 A Yes.</p> <p>6 Q Where were the other facilities that he</p> <p>7 received treatment?</p> <p>8 A White Deer Run. He completed that when</p> <p>9 he was 15.</p> <p>10 Q Okay.</p> <p>11 A And he went back and completed it again</p> <p>12 as an adult.</p> <p>13 Q Same facility?</p> <p>14 A No. This one was in Lebanon. The other</p> <p>15 one was a children's facility with --</p> <p>16 Q Both White Deer Run, just two different</p> <p>17 locations?</p> <p>18 A Yes, yes. I have certificates at home to</p> <p>19 prove it. He also completed Doe Rehab that they had</p> <p>20 in the prison?</p> <p>21 Q Doe, D-O-E?</p> <p>22 A Yes.</p> <p>23 Q As in like a deer doe?</p> <p>24 A Yes.</p>	<p style="text-align: right;">Page 53</p> <p>1 A No.</p> <p>2 Q Okay. So I think I originally asked you</p> <p>3 how many times he was incarcerated at Lancaster</p> <p>4 County Prison, and you weren't sure.</p> <p>5 A Right.</p> <p>6 Q But it was more than once?</p> <p>7 A Yes.</p> <p>8 Q Was he incarcerated in any other prisons</p> <p>9 besides Lancaster?</p> <p>10 A Yes.</p> <p>11 Q Where else was he incarcerated?</p> <p>12 A Lebanon.</p> <p>13 Q Lebanon?</p> <p>14 A Yes.</p> <p>15 Q And what was that for?</p> <p>16 A I think that was for taking recyclables.</p> <p>17 Q Any place other than Lebanon and</p> <p>18 Lancaster where he was incarcerated?</p> <p>19 A No, and he -- I just thought of this for</p> <p>20 rehab, but I don't know if you consider it rehab.</p> <p>21 He had problems as a child, and I had him in Philly</p> <p>22 Haven Psychiatric Hospital, and he finished that</p> <p>23 three times.</p> <p>24 Q So three different stays at Phil Haven?</p>

KRISTI GOOD

<p style="text-align: right;">Page 54</p> <p>1 A It was outgoing.</p> <p>2 Q I'm sorry?</p> <p>3 A Outgoing.</p> <p>4 Q Outpatient --</p> <p>5 A It was like school. They'd pick him up</p> <p>6 at 8:00 and brought him home at 2:00.</p> <p>7 Q Okay. So I guess we call that</p> <p>8 outpatient. He wasn't living there. He would go</p> <p>9 for treatment.</p> <p>10 A Right, he did counseling.</p> <p>11 Q And there was, say, three different time</p> <p>12 periods?</p> <p>13 A Yes.</p> <p>14 Q And what was that for?</p> <p>15 A It's when he was younger. He got</p> <p>16 molested by the babysitter, and his dad beat him</p> <p>17 when he was real young.</p> <p>18 Q That's John Good?</p> <p>19 A Robert Good.</p> <p>20 Q I'm sorry. Robert Good. Okay. So let</p> <p>21 me go through some background stuff now. What was</p> <p>22 the highest grade Andrew completed?</p> <p>23 A 11th, but in 12th he did complete</p> <p>24 construction at vo-tech and he graduated.</p>	<p style="text-align: right;">Page 56</p> <p>1 counseling as a result of your son's death?</p> <p>2 A I spoke with my preacher. I have to see</p> <p>3 a doctor regularly for my anxiety. I also had to</p> <p>4 get -- what is it? An emotional support dog,</p> <p>5 because my anxiety is so bad sometimes I just shake,</p> <p>6 and I can't stop, and I cry. I didn't sleep for</p> <p>7 weeks in a row.</p> <p>8 Q Who is your doctor that you get -- you</p> <p>9 take anxiety medication?</p> <p>10 A Yes, I do.</p> <p>11 Q And who's the doctor that prescribes</p> <p>12 that?</p> <p>13 A Can I look?</p> <p>14 Q Sure, absolutely.</p> <p>15 A It's with WellSpan. Her name is Diane.</p> <p>16 I just can't remember her last name. Diane Vazquez.</p> <p>17 Q Is she like a family doctor, or is she a</p> <p>18 psychiatrist or...</p> <p>19 A She's a family doctor.</p> <p>20 Q How long has she been your family doctor?</p> <p>21 A For a little over a year.</p> <p>22 Q And who was your --</p> <p>23 A Well, actually, it was longer than that.</p> <p>24 It might have been two years.</p>
<p style="text-align: right;">Page 55</p> <p>1 Q What high school did he go to?</p> <p>2 A Ephrata.</p> <p>3 Q And we already talked about his</p> <p>4 employment history. Other than the four to five</p> <p>5 months at the bakery --</p> <p>6 A Oh, you know what, it wasn't Ephrata.</p> <p>7 Sorry. It was Manheim Central. I forgot. We were</p> <p>8 living in Manheim at the time.</p> <p>9 Q Did he go to more than one high school</p> <p>10 for different grades?</p> <p>11 A Yeah, we -- Manheim and Ephrata.</p> <p>12 Q And why two different high schools?</p> <p>13 A Because we moved.</p> <p>14 Q Okay. Other than the four to five months</p> <p>15 you think working at the bakery, any other</p> <p>16 employment?</p> <p>17 A Not that I -- I mean, he did side jobs,</p> <p>18 but not that I can remember now.</p> <p>19 Q In this lawsuit, I'm just trying to</p> <p>20 figure out: Are you seeking damages for yourself</p> <p>21 personally or just for the estate?</p> <p>22 A For both.</p> <p>23 Q Okay. So tell me about -- let me go to</p> <p>24 the complaint then. Have you received any kind of</p>	<p style="text-align: right;">Page 57</p> <p>1 Q Wasn't she your family doctor prior to</p> <p>2 this incident?</p> <p>3 A I think right around that incident I</p> <p>4 started going there because of my insurance.</p> <p>5 Q Okay. Prior to the incident had you had</p> <p>6 any kind of treatment for anxiety, depression, any</p> <p>7 other kind of emotional --</p> <p>8 A Yeah, I did have some depression before</p> <p>9 that with him being in jail, but it got ten times</p> <p>10 worse after.</p> <p>11 Q And who did you see for your depression</p> <p>12 prior to this incident?</p> <p>13 A I went to Shepherd's Touch for a while.</p> <p>14 Q And what's Shepherd's Touch?</p> <p>15 A It's a counseling facility.</p> <p>16 Q And is that located in Lancaster?</p> <p>17 A It's on 322 going towards Lebanon.</p> <p>18 Q Okay.</p> <p>19 A I also went to -- I think it's called</p> <p>20 Lebanon -- what is it? Lebanon Family Counseling or</p> <p>21 Lancaster Family --</p> <p>22 Q This was all prior to this incident?</p> <p>23 A Some of -- no, some of it was after. I'm</p> <p>24 sorry.</p>

KRISTI GOOD

<p style="text-align: right;">Page 58</p> <p>1 Q Okay. Lebanon Family Counseling. And</p> <p>2 Shepherd's Touch was prior to the incident or --</p> <p>3 A Prior and I had to go back after again.</p> <p>4 I had started back up, and I talk to my pastor a lot</p> <p>5 about it.</p> <p>6 Q Who's your pastor? What church do you</p> <p>7 attend?</p> <p>8 A It's called Victory, and it's Pastor</p> <p>9 Jeremiah. I can't think of his last name right now.</p> <p>10 I'm sorry. We just call him Pastor Jeremiah.</p> <p>11 Q Sure. And where is Victory located?</p> <p>12 A The one we go to is in Lititz, and I also</p> <p>13 talked to another pastor at Victory before that that</p> <p>14 dealt with loss of family, and -- but he's -- he</p> <p>15 retired. He was at the Victory in Lancaster.</p> <p>16 Victory has five churches.</p> <p>17 Q Right. I know that, so the one in</p> <p>18 Lancaster is the one right downtown. They meet in</p> <p>19 the hotel?</p> <p>20 A This one ain't in the hotel. This one</p> <p>21 is -- what is that called?</p> <p>22 Q But they have their own building?</p> <p>23 A Yeah. Victory has its own building</p> <p>24 there.</p>	<p style="text-align: right;">Page 60</p> <p>1 living somewhere else; correct?</p> <p>2 A Yes.</p> <p>3 Q So did he give you any money to help pay</p> <p>4 for your rent or food?</p> <p>5 A No.</p> <p>6 Q Okay. You've been on disability for a</p> <p>7 number years, so you haven't lost any time from</p> <p>8 work?</p> <p>9 A No.</p> <p>10 Q Other than the funeral expenses, which</p> <p>11 were about somewhere between six and eight, any</p> <p>12 other economic loss that you can think of?</p> <p>13 A Not economic, but I lost a chance to have</p> <p>14 grandkids. I lost a chance of having a</p> <p>15 daughter-in-law, everything he wanted in life. His</p> <p>16 dream was to have -- to get married and have three</p> <p>17 kids, and I have his diary at home that came from</p> <p>18 the rehab. He had dreams. I'll never have</p> <p>19 grandkids from him. I'll never have any of that. I</p> <p>20 lost his whole life. He was only 24 years old. He</p> <p>21 was healthy. I lost his whole entire life to this,</p> <p>22 which could have been grandkids, would have been his</p> <p>23 wife. He wanted kids so bad. He just wanted to be</p> <p>24 loved. That was the paper I got from him.</p>
<p style="text-align: right;">Page 59</p> <p>1 Q So you attended sometimes in that Victory</p> <p>2 location in Lancaster and sometimes in Lititz?</p> <p>3 A Yes.</p> <p>4 Q Okay. In your complaint you list some of</p> <p>5 the damages, and so one of the damages says economic</p> <p>6 loss. What's the economic loss that you're seeking?</p> <p>7 A I had to pay for his -- all my money went</p> <p>8 towards his funeral for two months. It took us</p> <p>9 quite a while to pay on the funeral.</p> <p>10 Q And what was the total cost of the</p> <p>11 funeral?</p> <p>12 A It was between six and eight. I can't</p> <p>13 tell you the exact number.</p> <p>14 Q And you have receipts for all this?</p> <p>15 A Yes, I do.</p> <p>16 Q Any other economic loss? Let me be more</p> <p>17 specific. Did your son provide any kind of</p> <p>18 financial support to you at any point in his life?</p> <p>19 Did he help pay for your rent? Did he give you</p> <p>20 money for food? Did he do anything to help support</p> <p>21 you financially?</p> <p>22 A Yeah. When he was working, he would help</p> <p>23 with rent.</p> <p>24 Q Well, at the time of the incident, he was</p>	<p style="text-align: right;">Page 61</p> <p>1 It just said, "I want to be loved. I</p> <p>2 want to feel loved. I want to have kids. I want to</p> <p>3 be married. I want to have a normal life like</p> <p>4 everybody else."</p> <p>5 And that was taken from him. He never</p> <p>6 got that chance.</p> <p>7 Q Did he have a girlfriend at the time of</p> <p>8 this incident?</p> <p>9 A Yes.</p> <p>10 Q And who was his girlfriend?</p> <p>11 A Kim.</p> <p>12 Q What's Kim's last name?</p> <p>13 A Rhee.</p> <p>14 Q Reed?</p> <p>15 A Rhee.</p> <p>16 Q How do you spell that?</p> <p>17 A R-H-E-E, but he just got with her. He</p> <p>18 was in a long-term relationship with Andi Garber.</p> <p>19 They were planning on getting married. They were</p> <p>20 together over two years.</p> <p>21 Q How did that end then?</p> <p>22 A Because he ran into Kim, and something</p> <p>23 happened with him and Kim, and he didn't want to --</p> <p>24 he knew he was going back to jail, and he didn't</p>

KRISTI GOOD

<p style="text-align: right;">Page 62</p> <p>1 want to hurt Andi again by going back to jail, 2 because Andi went through it the first time with 3 him. 4 And he told Andi, "I can't put you 5 through this again. I care too much about you." 6 She still has his ring. 7 Q The complaint also talks about lost 8 economic opportunity. What's that? It says, "Lost 9 economic opportunity." 10 A His opportunity get a job and do what he 11 wanted to do. He wanted to finish school. He 12 passed his class in construction. He was going 13 to -- he started to be an electrician. He had so 14 many credits to be -- his dream was to go back and 15 finish his credits at vo-tech. He went to 16 Brownstown Vo-Tech. 17 Q When was he first diagnosed with having 18 an addiction, a drug addiction? 19 A Probably when he was about 16 he started 20 struggling. 21 Q What was the longest period of time 22 between 16 -- and you said he was 24 when he died? 23 A Yeah. 24 Q During that eight years what was the</p>	<p style="text-align: right;">Page 64</p> <p>1 A Dirty urine. 2 Q So he was at least using then; right? 3 A Yes. 4 Q Okay. So to your knowledge the longest 5 period of time that he wasn't using drugs he may 6 have actually been using drugs after all if he had 7 dirty urine; correct? 8 A Yeah, but it -- I don't know how to 9 explain it. The hard drugs is what he was really 10 struggling with. 11 Q What were the hard drugs that he had 12 addictions to? 13 A Heroin and coke. 14 Q Okay. 15 A But he also smoked marijuana. 16 Q Okay. Give me a second here. I'm going 17 to stick with the damage piece. It has lost 18 economic opportunity. It talks about lost future 19 earning capacity. That's what you've told me, that 20 he was going to get himself clean and get a job and 21 have a life. 22 A Right. 23 Q Okay. 24 A When he first got out of his rehab, we</p>
<p style="text-align: right;">Page 63</p> <p>1 longest period of time that he was not using drugs? 2 A About a year and a half. 3 Q And when was that in relation to this 4 time span? 5 A Well, it was right before -- about two 6 years prior. I can't say for sure. I don't -- I 7 just know -- 8 Q So let me just kind of -- let's walk 9 backwards. So this happened April of 2018; right? 10 A Yeah. 11 Q And you said he had been in a rehab 12 facility prior to this incident. 13 A And in jail before that. 14 Q And in jail prior to that. So, 15 obviously, when he was in jail he was not using. 16 A Correct. 17 Q We would hope not anyhow. 18 A Right. 19 Q What was the longest period of time, this 20 period you mentioned? Was that before he went in 21 the jail? 22 A Yes. 23 Q And what was he in jail for the last time 24 that he ended up with rehab?</p>	<p style="text-align: right;">Page 65</p> <p>1 were calling different rehabs for him to try to get 2 him so he could call his probation so he wouldn't -- 3 the cops wouldn't get him. We've called three of 4 them to try to get him in, but there was no space. 5 He wanted to go in right after -- even though he ran 6 from that one, he wanted to get right into another 7 one so he wouldn't get in trouble. 8 Q So he ran from the last one, and that 9 weekend between that running and -- I guess they 10 call it eloping, I think is the word they use -- 11 from a rehab facility up to the week of this 12 incident, he was trying to get into another 13 facility? 14 A Right. 15 Q Okay. And what facilities did he try to 16 get into? 17 A I know he tried White Deer Run, but they 18 said he couldn't go back there. 19 Q And why was that? 20 A The Lancaster one is the one he ran from 21 before. Lebanon, he passed; but Lancaster, he ran. 22 Q So this wasn't the first time he left a 23 rehab facility. 24 A Correct.</p>

KRISTI GOOD

<p style="text-align: right;">Page 66</p> <p>1 Q How many times did he run from the rehab 2 facility?</p> <p>3 A Two.</p> <p>4 Q The one just prior to this incident in 5 White Deer Run in Lancaster.</p> <p>6 A Right. He stayed in one in Lebanon and 7 not the Lancaster one.</p> <p>8 Q Okay. So in that week in between he 9 tried to get back into the White Deer at Lancaster, 10 and they said, "No. Because you ran from here 11 before, we want don't you back"?</p> <p>12 A Pretty much.</p> <p>13 Q Okay.</p> <p>14 A And then he tried one in Reading, but I 15 don't know what it was called.</p> <p>16 Q Okay. Any others that you know of?</p> <p>17 A No.</p> <p>18 Q And how did you know this? You said you 19 wouldn't let him live with you because you were so 20 mad at him for leaving the rehab facility. Did you 21 have any conversation with him that week?</p> <p>22 A Yes.</p> <p>23 Q Okay. When did you have a conversation 24 with him?</p>	<p style="text-align: right;">Page 68</p> <p>1 Q Did he appear to be under the influence 2 of either alcohol or drugs when you had this 3 conversation with him?</p> <p>4 A Yes.</p> <p>5 Q Do you know which?</p> <p>6 A No, I can't say. I wasn't with him the 7 whole time. I know he had alcohol, and I don't know 8 if he had drugs. I can't answer that.</p> <p>9 Q Sure. I'm just asking you -- you as his 10 mom would probably know him better than anybody. 11 When you're having the conversation with him the day 12 of his arrest, was it your --</p> <p>13 A He wasn't himself. I can say that.</p> <p>14 Q Okay. And what was different about him?</p> <p>15 What was -- when you say he wasn't himself, what was 16 your intuition as his mom as to what was going on 17 with him?</p> <p>18 A That he was partying, but I can't say for 19 sure.</p> <p>20 Q Okay. So he's telling you he wants to 21 get help, but while you're talking to him about him 22 wanting to get help, he had been partying, or at 23 least that's what you thought?</p> <p>24 A Which is why he wants help, because he</p>
<p style="text-align: right;">Page 67</p> <p>1 A Out back when I took him chicken.</p> <p>2 Q When you took him chicken?</p> <p>3 A He had a vodka bottle in his hand, and I 4 took him -- this was the day he was getting 5 arrested. And I know when he was drinking, he 6 probably didn't eat anything, and I wanted him to 7 eat something, because he looked so bad. So I took 8 a plate of fried chicken out to him.</p> <p>9 Q Okay.</p> <p>10 A And I told him I loved him.</p> <p>11 And he said, "Mom, I'm trying to get in."</p> <p>12 And he told me he was trying, and that 13 was it.</p> <p>14 He goes, "You know I'm going back."</p> <p>15 Q And this conversation was the day of this 16 incident?</p> <p>17 A (No audible response.)</p> <p>18 Q Yes?</p> <p>19 A Yeah.</p> <p>20 Q And he had a bottle of vodka in his hand?</p> <p>21 A Yes.</p> <p>22 Q And do you know how much of the vodka he 23 had drank?</p> <p>24 A I don't know.</p>	<p style="text-align: right;">Page 69</p> <p>1 was always afraid with the heroin that he would -- 2 somebody would give him heroin with fentanyl and it 3 would take his life, so he knew he needed help.</p> <p>4 Q Okay. I'm not talking about 5 unintentional, but had Andrew ever tried to take his 6 life? Did he ever try to commit suicide at any 7 point?</p> <p>8 A I don't know for sure. I know in jail 9 there was an incident that he had to go into a 10 special unit, but I don't know what happened.</p> <p>11 MR. MAC MAIN: Okay. Tell you what, why 12 don't we take a short break, get some fresh air.</p> <p>13 (A recess was taken.)</p> <p>14 BY MR. MAC MAIN:</p> <p>15 Q I said in the beginning if there was 16 anything that you thought was incorrect in your 17 answers, you thought of something that you wanted to 18 add. Are there any in your answers given so far 19 that you think you need to add to, correct, or 20 change in any way?</p> <p>21 A No.</p> <p>22 Q Okay. You had answered some questions -- 23 they're called interrogatories -- that we sent 24 through your attorney about different things. I</p>

KRISTI GOOD

<p style="text-align: right;">Page 70</p> <p>1 just wanted to follow up on a couple. 2 So we had asked about his work history. 3 You say here he worked at a bakery in Lititz earning 4 \$12 an hour. When did that employment end? That 5 was the one about -- you thought maybe four or five 6 months. Would that have been -- 7 A 2016 or 2017. It burned down. 8 Q And then he ends up at some point after 9 that going to Lancaster County Prison, then he -- 10 A Well, he was working through temp 11 services, and then that's when he ended up -- 12 Q Okay. So it goes on. It says TempForce 13 and Engage Temp Services. What was he doing? 14 A Construction and different things, 15 packing, whatever they had for him. 16 Q And what was the longest assignment he 17 had during that time period? 18 A They were always temps, like a week here, 19 a week there. 20 Q Did he file tax returns? 21 A No. 22 Q Do you know what his highest income ever 23 was for a single year? 24 A No. I'm trying to think about what that</p>	<p style="text-align: right;">Page 72</p> <p>1 A Miller. 2 Q Okay. 3 A He's with Akron Fire Company. He said he 4 never in his life seen anything handled like this 5 before, that it was -- no profession whatsoever. It 6 was the worst. 7 Q Okay. This was about the recovery of the 8 body? 9 A I guess. The whole thing, since the time 10 he got there -- the way they talked on the radio and 11 everything, he couldn't believe it. That one point 12 they said there was an officer missing, well, she 13 was at the park. She wasn't even missing. 14 Q Okay. So it's things like that is what 15 you think he was referring to? 16 A And the sack of potatoes kind of things 17 and -- 18 Q Okay. So my question very specifically 19 with the sack of potatoes, did you hear that on the 20 radio? 21 A Yes, I did. 22 Q Was it a male voice or a female voice? 23 A A male voice. 24 Q But you don't know who it was?</p>
<p style="text-align: right;">Page 71</p> <p>1 would have been, but I can't do it in my head. 2 Q He had no life insurance at the time of 3 his death? 4 A No. 5 Q And no medical insurance either? 6 A Well, he did through the state, but when 7 you're in jail, I think they take them away. 8 Q Okay. 9 A I still get a hospital bill from that 10 day. 11 Q You had told me earlier you heard, like, 12 radio transmissions, and you heard somebody say 13 something about taking his body out like a sack of 14 potatoes. Do you know who said that? 15 A No, I don't. 16 Q Okay. 17 A When I heard this stuff over the radio 18 where I was blocked in, none of it made sense. They 19 were really ignorant. I couldn't believe what I was 20 hearing, and even the firemen that I talked to after 21 the -- after everything -- I can't think of his name 22 right now. I know his last name now, but now I 23 can't think of his first name. 24 Q What's his last name?</p>	<p style="text-align: right;">Page 73</p> <p>1 A No, I do not. 2 Q Okay. So Jessica Trout was the person 3 you talked about before that was a friend of 4 Andrew's who -- 5 A Yeah, this was the hardest recovery she 6 ever had to do. She didn't know it was Andrew. She 7 didn't even know I was there, because I was blocked 8 in at the top. 9 Q Other than the people you've already told 10 me about you spoke with -- you've told me a number 11 of people -- is there anybody else you recall 12 speaking to about the incident? 13 A My family. 14 Q Your family. Anyone else? Your pastor, 15 you talked about two counselors -- 16 A I talked to my -- a couple of my close 17 friends. 18 Q Okay. Have you written anything down, 19 any kind of, like -- the conversations you had -- 20 A Yeah. 21 Q -- you kind of wrote down what people 22 said? 23 A Yes. 24 Q And where is that? In a diary or on a</p>

KRISTI GOOD

<p style="text-align: right;">Page 74</p> <p>1 piece of paper? Where?</p> <p>2 A It was on a piece of paper.</p> <p>3 Q Okay. And what do you recall you wrote</p> <p>4 on a piece of paper?</p> <p>5 A Like the tasing, why he -- why she didn't</p> <p>6 grab him. Why --</p> <p>7 (There was a telephonic interruption</p> <p>8 in the proceedings.)</p> <p>9 THE WITNESS: I'm so sorry. I thought I</p> <p>10 had it off.</p> <p>11 BY MR. MAC MAIN:</p> <p>12 Q Sure, it's okay. It's fine.</p> <p>13 A So sorry. I wrote about how I didn't</p> <p>14 understand, and then -- I'm trying to think.</p> <p>15 Q These are just --</p> <p>16 A I sent it to you -- and different things</p> <p>17 about -- I meant I sent the notes to him.</p> <p>18 Q Oh, okay. I thought you were sending him</p> <p>19 a text during the deposition.</p> <p>20 A No, no. I'm saying I sent the notes I</p> <p>21 had to him.</p> <p>22 Q Okay. Referring to Attorney Baird?</p> <p>23 A Yes.</p> <p>24 Q Okay.</p>	<p style="text-align: right;">Page 76</p> <p>1 Q Okay. And then there was an internal</p> <p>2 review done by the sheriff's department. Have you</p> <p>3 ever looked at that?</p> <p>4 A No.</p> <p>5 Q Okay. So what you've looked at is the</p> <p>6 video, which you talked about that you think Deputy</p> <p>7 Sheriff Gunnnett was so close she could have grabbed</p> <p>8 Andrew?</p> <p>9 A In one time.</p> <p>10 Q Okay. Anything else other than what</p> <p>11 you've already told me you've looked at?</p> <p>12 A I got to hear him in the police car. I</p> <p>13 got to hear his voice.</p> <p>14 Q From the radio calls?</p> <p>15 A No.</p> <p>16 Q How did you hear his voice in the police</p> <p>17 car?</p> <p>18 A The DA actually had a recording of him</p> <p>19 talking in the police car.</p> <p>20 Q And what did you hear him say?</p> <p>21 A Just that he knew he was going back to</p> <p>22 jail. He didn't want to, that nobody knows how</p> <p>23 Ephrata is, and that to tell us he loves us.</p> <p>24 Q He said that in the police car?</p>
<p style="text-align: right;">Page 75</p> <p>1 MR. BAIRD: We're not texting during the</p> <p>2 deposition, just --</p> <p>3 MR. MAC MAIN: I didn't think you were,</p> <p>4 but she picked up her phone and said, "I sent that</p> <p>5 to you."</p> <p>6 THE WITNESS: No, I was trying to turn it</p> <p>7 off. I can't figure out how to turn my new phone</p> <p>8 off. I'm sorry.</p> <p>9 BY MR. MAC MAIN:</p> <p>10 Q That's okay.</p> <p>11 A But it was different questions about --</p> <p>12 that didn't make sense with the DA and everything</p> <p>13 that questioned at the time.</p> <p>14 Q And they were notes you sent to your</p> <p>15 counsel.</p> <p>16 A Right.</p> <p>17 Q Okay. I'd asked earlier what you looked</p> <p>18 at, and I -- let me ask you -- let me be more</p> <p>19 specific. There were 115 pages that we sent, which</p> <p>20 would have been interviews from the district</p> <p>21 attorney's office, some reports, statements by</p> <p>22 different officers. Have you ever looked at any of</p> <p>23 that?</p> <p>24 A No.</p>	<p style="text-align: right;">Page 77</p> <p>1 A Yes.</p> <p>2 Q And that was -- do you know if that was</p> <p>3 being transported --</p> <p>4 A To the hospital.</p> <p>5 Q To the hospital. Okay.</p> <p>6 A And I -- I also got to another -- there</p> <p>7 was another video where I seen him a little more</p> <p>8 that the DA had. I forget what it was, that -- it</p> <p>9 was a little more processive (ph.) than that, when</p> <p>10 that was on TV.</p> <p>11 Q A little more what?</p> <p>12 A It had -- it was a little longer than the</p> <p>13 one on TV. It went in a little bit more into</p> <p>14 detail.</p> <p>15 Q And what was the -- it was the DA's press</p> <p>16 conference?</p> <p>17 A Not his press conference. He met with us</p> <p>18 before that. He called me in before he put anything</p> <p>19 on the news.</p> <p>20 Q What video are you talking about that</p> <p>21 was --</p> <p>22 A The one that he showed at the press</p> <p>23 conference, but he didn't show the whole thing.</p> <p>24 Q Okay.</p>


KRISTI GOOD

<p style="text-align: right;">Page 78</p> <p>1 A He kept some it and -- like, the whole 2 shackle thing don't make sense. The shackles worked 3 perfectly fine. Somebody should have been checking 4 shackles. 5 Q Do you know why the shackles were put on 6 your son? 7 A Yes, so he wouldn't run. 8 Q Okay. And why? Were they concerned that 9 he was going to run from them? 10 A Because of the last incident. I won't 11 lie to you, but why wouldn't they be checked is my 12 question. She put -- Officer Stone had to take his 13 off, and he watched her start to put hers on. So at 14 some point she forgot to check the shackles, because 15 at the press conference, guess what? The shackles 16 worked perfect at the DA's Office. But either way 17 his hands were like this (indicating) the whole 18 time, and the other shackles were on a belt. I got 19 to see that up close at the DA. The belt and how 20 his hands were like this (indicating), he couldn't 21 reach anywhere. 22 MR. MAC MAIN: Okay. Those are all the 23 questions I have. Attorney Boyle may have questions 24 for you.</p>	<p style="text-align: right;">Page 80</p> <p>1 woods, that they actually spotted him before going 2 into the creek. 3 Q Who told you that? 4 A The officers. I think it was Officer 5 Shepherd or Officer Schmidt. One of those two said 6 it at the DA's, that he was standing on the bank 7 present before he went into the water. 8 Q So Officer Schmidt was present when he 9 went into the water? 10 A I believe -- I can't say which officer 11 for sure. I don't -- I know there was an officer 12 there, because they saw him on the bank. They told 13 me they saw him on the bank before going into the 14 water. 15 Q Okay. We provided copies of the 16 interviews with the Ephrata officers to you through 17 your counsel. Have you had the opportunity to -- 18 A No, I did not. 19 Q Okay. So is it safe to say you don't 20 have any firsthand information about an Ephrata 21 officer being present when your son went in the 22 creek? 23 A Well, they told me they were there and 24 seen him on the bank, so they were there when he</p>
<p style="text-align: right;">Page 79</p> <p>1 EXAMINATION 2 BY MR. BOYLE: 3 Q Hello again. 4 A Hi. 5 Q My name is Chris Boyle. I represent the 6 Ephrata defendants. Can you hear me okay, Ms. Good? 7 A Yes. 8 Q I'm going to call you Kristi, too, if 9 that's all right. 10 A That's fine. 11 Q I just have a handful of questions. I 12 think Mr. MacMain went over just about everything I 13 would have asked you as well, but specific to the 14 Ephrata Police Department, do you have any 15 information that any Ephrata officer was physically 16 present when your son went into the Cocalico Creek? 17 A Yes. On the video it showed that she had 18 waited for an officer to get there before acting, 19 because they said it was for her own safety. 20 Q Okay. So it's your belief that your son 21 was already in the creek when the Ephrata officers 22 showed up? 23 A I don't exactly know. They said -- 24 because they told me they saw him standing in the</p>	<p style="text-align: right;">Page 81</p> <p>1 went in the creek. They told me themselves. 2 Q And that was Schmidt? 3 A It was either Schmidt or Shepherd, the 4 ones that were at the DA, and you can look it up. 5 Whoever was at the DA told me, and it was the 6 officer, that they seen him on the bank before he 7 went into the water. 8 Q Do you have any information that those 9 officers or any other Ephrata officer tased him 10 while he was at or near the creek? 11 A I don't know who shot the other two 12 Tasers. 13 Q Okay. So the answer is no, you have no 14 firsthand information as to that. 15 A Right. 16 Q Have you already described all 17 conversations you had with Ephrata -- and not just 18 the police department, anybody from Ephrata 19 whatsoever -- 20 A Yes. 21 Q I'm sorry. I didn't get it all out -- in 22 relation to the tragic death of your son? Have you 23 had -- now I'm done. I'm sorry. 24 A Yes.</p>

KRISTI GOOD

<p style="text-align: right;">Page 82</p> <p>1 Q Okay. That was very nice of you to wait. 2 I'm sorry. 3 A I'm sorry. 4 Q I'm asking bad lawyer questions today. 5 Have you ever -- do you recall any 6 conversations with Officer Rivera, whose deposition 7 is tomorrow, Beth Rivera? 8 A See, I don't remember the officer's name. 9 I remember talking to one female officer right 10 after, because at that point I was very confused, 11 and my heart was broken. To this day I lost a piece 12 of me. I lost my son. 13 Q I understand. 14 A And at that point I didn't get to really 15 focus on the video. I didn't know what I was going 16 to do at that point, but I knew a female officer 17 jumped in the water. 18 Q Okay. 19 A And it was only two female officers that 20 jumped in the water, and I thanked them for at least 21 doing that. 22 Q Okay. 23 A Even if they were the ones to tase him, 24 at least they went in the water to hopefully save</p>	<p style="text-align: right;">Page 84</p> <p>1 A When he was like 12. 2 Q Okay. Did he treat for -- and how about 3 ADHD? 4 A Yeah, he got treated for that. 5 Q Was he treating for that at the time of 6 his death? 7 A No. 8 Q When was the last time he had received 9 treatment for ADD or ADHD? 10 A Before he went into jail, and then they 11 kept playing with his medicine in there. 12 Q Okay. So he didn't get proper treatment 13 in the jail for his ADD and his ADHD. 14 A Correct. 15 Q And he didn't seek any treatment for it 16 after he eloped from the rehab, did he? 17 A No. 18 Q I would imagine that wouldn't be number 19 one of the list of priorities after you leave rehab, 20 but I have to ask. 21 A Right. 22 Q Is there anything else you think is 23 important for the attorney for Ephrata Police 24 Department to know about this case?</p>
<p style="text-align: right;">Page 83</p> <p>1 him. 2 Q Okay. But, again, you have no firsthand 3 information that these female officers tased him 4 either; correct? 5 A Correct. 6 Q Okay. 7 A I just know they went -- two females went 8 in the water. 9 Q Okay. Do you know the one -- you 10 mentioned a missing officer. Were you aware that 11 one officer laid her radio and other equipment down 12 to search further down the creek? 13 A She was way over at the park. 14 Q Right. Were you aware that she had laid 15 her equipment down so she could search in the creek 16 further down for your son? 17 A No, I was not aware of that. 18 Q This is the first you're hearing that? 19 A Yes. 20 Q Okay. Your attorney sent us 1658 pages, 21 I think, of records, which I went over over the 22 weekend. Just two questions come up on that: When 23 was your son first diagnosed with attention deficit 24 disorder?</p>	<p style="text-align: right;">Page 85</p> <p>1 A My only thing is I know that creek very 2 well, and I've already said it to you. I don't know 3 who shot those other two Tasers, but I did read 4 everybody's statement in the back of the autopsy, 5 that it took me almost two years to get, and them 6 statements, half of them don't make sense, because 7 it said it had four Tasers in him. 8 And my thing is -- and this goes out to 9 her and other officers is to protect -- to serve and 10 protect. Why he was on -- instead of trying to talk 11 him off the bank, at one point -- I wished I knew 12 the officer's name that did say he was tased. I 13 don't know who tased him, and I don't know the 14 officer's name, because my memory from two years ago 15 isn't the best, because that was my baby. My memory 16 to this day isn't the best, but you have -- but four 17 Tasers were in him when he was pulled out, and 18 there -- from this to the end of that table -- from 19 the woods to the end of the table, that's the creek. 20 Watching the video, there's two Tasers in him. So 21 somebody tased him from this end of the table to 22 that end of the table twice. 23 Q Okay. 24 A Which to me makes me believe, okay, he</p>

KRISTI GOOD

<p style="text-align: right;">Page 86</p> <p>1 was tased. Maybe he wasn't tased in the water, but 2 he fell in the water with the Taser in him. 3 Q Okay. So this is an alternate theory as 4 to how he got into the water, that he was tased on 5 the side and then fell. 6 A Correct. 7 Q That's another possibility. 8 A And that was said by an officer, too. 9 Q Okay. Did you have the opportunity to 10 review that autopsy report with your attorney before 11 coming in here today to testify, or did you just 12 read it on your own? 13 A We talked about. 14 Q I don't want to hear exactly what you 15 said, because that's privileged information, but you 16 did have the opportunity to go over it with counsel 17 before testifying under oath today; correct? 18 A Yes. 19 MR. BOYLE: Okay. That's all I have for 20 you, Ms. Good. Ms. Good, I am truly sorry for your 21 loss. No parent should ever bury a child. 22 THE WITNESS: Thank you. 23 MR. BOYLE: God bless. Nothing further. 24 MR. MAC MAIN: Just had a couple of</p>	<p style="text-align: right;">Page 88</p> <p>1 me right away. 2 Q Okay. What about with Andrew and your 3 ex-husband? Were they charged or -- 4 A Andrew was charged. 5 Q And what happened with his charges? 6 A He got -- he only got probation for that. 7 That was his first charge ever. 8 Q What about your ex-husband? 9 A He also got probation. 10 Q And you were also charged, but you're 11 saying they were dismissed as to you? 12 A Yes. You can look. 13 MR. MAC MAIN: Okay. That's all the 14 questions I have. Thank you. 15 MR. BAIRD: I have no questions. 16 --- 17 (The witness was excused.) 18 --- 19 (The deposition concluded at 20 approximately 11:30 a.m.) 21 22 23 24</p>
<p style="text-align: right;">Page 87</p> <p>1 follow-ups. 2 FURTHER EXAMINATION 3 BY MR. MAC MAIN: 4 Q I have Andrew's criminal history, and I 5 have your criminal history, and there was -- I'm not 6 going to go through it all, but there was one that 7 just struck me as odd. It looks like -- 8 October 1st, 2012, it looks like Andrew was charged 9 with theft by unlawful taking, conspiracy, and 10 receiving stolen property, and you were charged the 11 same date with conspiracy, receiving stolen 12 property, and theft by unlawful taking. 13 A That was dropped by me. The charges of 14 that was dropped. That was in Lebanon. What 15 happened was my ex and Andrew were recycling. They 16 went to knock on the door to ask if they could have 17 the things. I was sleeping in the car. That's 18 why -- I never got out of the car, which the people 19 at the house testified. I was yelling at them that 20 they shouldn't be taking them without permission. 21 I said, "Andrew, that's not the way to do 22 it, no." 23 And they heard me yelling, no, no, so 24 they -- when we got to court, it was dropped against</p>	<p style="text-align: right;">Page 89</p> <p>1 C E R T I F I C A T E 2 3 4 I do hereby certify that I am a Notary 5 Public in good standing; that the aforesaid 6 testimony was taken before me at the time and place 7 indicated; that said deponent was by me duly sworn 8 to tell the truth, the whole truth, and nothing but 9 the truth; that the testimony of said deponent was 10 correctly recorded in machine shorthand by me and 11 thereafter transcribed under my supervision with 12 computer-aided transcription; that the deposition is 13 a true and correct record of the testimony given by 14 the deponent; that a review of the transcript by the 15 deponent was not requested; and that I am neither of 16 counsel nor kin to any party in said action nor 17 interested in the outcome thereof. 18 19 I declare under penalty of perjury that 20 the foregoing is true and correct. Dated this 21 1st day of September, 2020. 22 23 24</p> <p style="text-align: center;">  Tony J. Cross Notary Public </p>

[& - arrest]

Page 1

&	215 2:5,17	acted 22:11,12	34:22 35:22 48:13
& 2:15	2300 2:16	acting 79:18	54:22 69:5 73:6
1	24 60:20 62:22	action 89:10	76:8 87:8,15,21
1 3:10 4:13 29:2,3	26 39:17 41:9	actual 14:14 29:17	88:2,4
10:05 1:18	27 46:18	add 28:19 69:18	andrew's 18:18
115 75:19	29 3:10	69:19 84:9,13	20:4 22:9,24 26:4
1194 89:18	2:00 54:6	added 8:1,4	35:5 52:19 73:4
11:30 88:20	3	addiction 30:11,16	87:4
11th 54:23	318-7106 2:11	31:6,7 62:18,18	andy 15:2
12 70:4 84:1	322 57:17	addictions 64:12	ann 5:16
1240 2:4	4	adhd 84:3,9,13	answer 4:3 6:5,24
12th 54:23	433 1:17 2:10	administrator	7:4,5,17,22 8:2,5
14 30:13 32:19	484 2:11	48:8	11:23 15:15 19:9
14th 18:24	4:30 15:19	adult 51:12	23:16 30:17 44:16
15 51:2,9	5	affiliated 52:1	68:8 81:13
1500 2:4	5 3:4 4:13	aforesaid 89:4	answered 69:22
15th 15:11	575-4555 2:17	afraid 46:1 69:1	answers 6:18,24
16 62:19,22	6	afternoon 15:12	8:8 48:22 69:17
1658 83:20	627-9999 2:5	15:19	69:18
17 1:12	7	ago 35:4 49:23	anxiety 56:3,5,9
18 30:9,9	7,000 48:22	85:14	57:6
1800 1:23	79 3:5	agreed 5:2	anybody 14:4 22:2
1801 1:23	8	ahead 34:13 36:10	26:14 27:20 28:23
19103 1:24 2:16	87 3:4	aided 89:8	31:11 34:15 37:21
19110 2:5	8:00 54:6	ain't 58:20	38:20 39:10 43:23
19382 2:10	a	air 7:12 69:12	68:10 73:11 81:18
1st 87:8 89:12	a.m. 1:18 88:20	akron 15:20 26:2	apartment 19:10
2	able 8:10 11:9	72:3	19:23
20 32:18	absolutely 56:14	alcohol 68:2,7	apartments 16:24
20-1431 1:6	abuse 17:22	alive 42:7,10,13,14	apologize 8:22
200 1:17 2:10	accident 9:16	42:17	apologized 9:17
2000 2:16	24:24 38:9 39:1	alleged 29:11	appear 68:1
2007 47:15	accidentally 39:3	alternate 86:3	appointed 48:8
2012 87:8	39:4	amish 47:24	approximately
2016 70:7	accommodate	andi 61:18 62:1,2	1:18 88:20
2017 70:7	7:13	62:4	april 15:11 18:24
2018 15:11 30:13	account 47:5,6,16	andrew 1:3 2:9	30:13 32:19 63:9
32:19 63:9		15:2,3,4 16:3,19	area 11:5 28:7
2020 1:12 89:12		16:22 17:2,18	arrest 13:24 14:5
		18:24 20:5 23:7	15:10,24 18:7
		25:3 33:17,19	19:14,20 20:11,22

[arrest - center]

Page 2

21:7 26:2 32:18 32:22 33:18 68:12 arrested 10:22 11:14,19 12:2,6,23 13:19 14:3,13 15:19 16:19,23 20:5 21:9 40:23 67:5 arresting 19:16 arrests 36:24 article 31:19,21 32:10,11 asked 8:15 41:13 43:5 45:23 53:2 70:2 75:17 79:13 asking 6:17 12:15 32:4 34:3 38:18 68:9 82:4 assets 47:1,4,5,17 48:19,20 assignment 70:16 assume 7:18 atlantic 1:23 attempt 11:4 attend 58:7 attended 59:1 attention 83:23 attorney 69:24 74:22 78:23 83:20 84:23 86:10 attorney's 75:21 audible 42:22 67:17 august 1:12 author 31:22 autopsy 27:23 28:13 85:4 86:10 averments 30:1 aware 83:10,14,17	b b 3:8 baby 85:15 babysitter 54:16 back 18:14 19:14 20:4 34:23 47:12 51:11 58:3,4 61:24 62:1,14 65:18 66:9,11 67:1,14 76:21 85:4 backed 38:7 39:8 39:10 background 32:2 54:21 backwards 63:9 bad 56:5 60:23 67:7 82:4 baird 2:3 11:22 15:14 37:24 38:2 44:15 74:22 75:1 88:15 bakery 49:13,18 55:5,15 70:3 bank 47:5,16 80:6 80:12,13,24 81:6 85:11 barbara 1:7 2:12 2:21 barracks 9:18 based 30:4 basically 20:23 basis 33:2 beat 54:16 beginning 8:19 69:15 behavior 34:16 belief 39:19 41:10 46:18 79:20 believe 28:11 30:1 30:15,21,22 38:14	38:17 41:14 42:13 42:19 45:8 71:19 72:11 80:10 85:24 belongings 20:6 belt 78:18,19 best 85:15,16 beth 20:19,24 33:12 34:7 82:7 better 11:18 50:9 68:10 big 24:20 bigger 35:11 bill 48:23 71:9 bills 49:4 bit 77:13 blame 27:6 bless 86:23 blocked 71:18 73:7 boat 23:5 bob 44:8 body 23:11,22 71:13 72:8 borough 1:8 2:18 bottle 67:3,20 boulevard 2:4 boxed 9:7 boyle 2:15 3:5 78:23 79:2,5 86:19,23 break 7:11,16,18 10:6 17:16 35:1 69:12 breaks 7:19 brian 14:11,12,18 14:19 16:13,14,16 17:3 19:15,19 20:1,23 25:15,15 25:19 33:13 34:7 47:22,22	bring 9:8,11 38:19 bringing 50:21 broadcast 10:13 broke 47:12 broken 82:11 brother's 35:16 brought 27:23 50:23 54:6 brownstown 62:16 building 58:22,23 bunch 16:10 burial 48:24 burned 49:14 70:7 bury 86:21 but's 23:1
			c c 2:1 89:1,1 call 5:24 54:7 58:10 65:2,10 79:8 called 5:20 18:3 45:22 57:19 58:8 58:21 65:3 66:15 69:23 77:18 calling 65:1 calls 76:14 calmed 35:22 capacity 64:19 car 36:21 37:2,5,8 76:12,17,19,24 87:17,18 cards 49:2 care 45:24 62:5 carry 9:9 case 5:19 84:24 cases 49:6 causing 46:19 cement 33:7 center 2:4

[central - da]

Page 3

central 55:7 certain 43:6 certificates 51:18 certification 5:4 certify 89:4 chance 50:16 60:13,14 61:6 change 69:20 changed 8:1,4 charge 88:7 charged 52:19 87:8,10 88:3,4,10 charges 87:13 88:5 chased 21:1,2 check 35:16 78:14 checked 50:19 78:11 checking 78:3 chester 1:17 2:10 chicken 67:1,2,8 child 53:21 86:21 children 48:16 children's 51:15 chris 79:5 christopher 1:8 2:12,15 church 58:6 churches 58:16 claims 6:11 29:12 clarified 8:1 class 62:12 clean 64:20 close 18:16,23 73:16 76:7 78:19 clothes 18:17 cocalico 39:18 79:16 coke 64:13 coleman 2:15	come 9:10 18:14 35:16 83:22 comes 19:3 coming 16:18 22:18 30:24 44:10 86:11 commencing 1:18 comment 14:3 commenting 32:9 commit 69:6 commotion 14:15 company 22:8 24:2 72:3 complaint 3:10 29:7,17,18,21 39:17 46:17 55:24 59:4 62:7 complete 9:16 38:9 51:4 54:23 completed 51:8,11 51:19 54:22 computer 89:8 concerned 78:8 concluded 88:19 condition 18:7 conduct 34:16 conference 77:16 77:17,23 78:15 confused 45:16 82:10 consider 53:20 consist 48:18 conspiracy 87:9 87:11 construction 25:17 48:1 54:24 62:12 70:14 continue 17:15 continued 27:1 42:9	conversation 6:21 7:3 36:23 45:14 66:21,23 67:15 68:3,11 conversations 12:21 73:19 81:17 82:6 cook 46:10 cooperate 11:19 copies 80:15 cops 21:1 65:3 copy 29:6 corey 43:18 correct 11:9 13:20 13:21 15:21 21:14 23:7,8,13 27:2 31:24 32:24 36:14 36:15 37:19 39:8 39:9,21 40:18,19 40:21,24 41:3,6,16 41:24 42:1,10,14 42:17,21 43:7,8,13 44:21 60:1 63:16 64:7 65:24 69:19 83:4,5 84:14 86:6 86:17 89:8,12 corrected 8:5 correctly 89:7 cost 59:10 counsel 2:6,12,18 5:2 6:4 7:19 75:15 80:17 86:16 89:10 counseling 54:10 56:1 57:15,20 58:1 counselor 50:10 50:12 counselors 73:15 county 1:7 2:12 5:18 52:5 53:4 70:9	couple 26:10 35:4 49:3,18 70:1 73:16 86:24 court 1:1 7:6 8:10 87:24 cover 29:17 cpboyle 2:17 crap 22:12 crazy 48:4 credentials 32:8 credit 49:1 credits 62:14,15 creek 11:3,8 13:5 13:13 22:19 23:21 26:5 27:13,20,21 28:6,7,9,16,21 36:13 37:17,19 38:5,12,14,21 39:8 39:15,18,24 40:2,6 40:13 41:5,12 42:16,20 43:3,13 43:20 44:1,5,12,14 44:20 46:20 79:16 79:21 80:2,22 81:1,10 83:12,15 85:1,19 crime 52:20 crimes 52:10,19 criminal 30:12,19 30:23 49:6 87:4,5 criticism 42:2 cross 1:19 89:18 cruz 45:6,7 cry 56:6 current 30:12 40:12,13 currently 47:7,19 d d 3:1 51:21 da 9:20,21 10:1 37:3,23 75:12
--	---	--	--

[da - ephrata]

Page 4

76:18 77:8 78:19 81:4,5 da's 26:8 37:3,10 38:6 45:12 77:15 78:16 80:6 dad 48:12 54:16 damage 64:17 damages 6:8,11 55:20 59:5,5 date 1:19 48:5 87:11 dated 89:12 daughter 35:15 60:15 david 2:9 5:17 davis 1:3 2:9 day 28:3 50:22 67:4,15 68:11 71:10 82:11 85:16 89:12 dead 37:13 dealt 58:14 death 35:16 56:1 71:3 81:22 84:6 debts 48:19 49:1,2 deception 52:15 52:17 decision 44:13 declare 89:11 deer 51:8,16,23 52:2,3 65:17 66:5 66:9 defendant 2:18 41:10 defendants 1:9 2:12 30:10 41:11 79:6 deficit 83:23 dennehey 2:15 denny 33:22,23,24 34:1	department 5:18 76:2 79:14 81:18 84:24 deponent 89:5,6,9 89:9 deposed 8:16 deposition 1:15 4:1 5:21,21 6:4 7:21,23 74:19 75:2 82:6 88:19 89:8 depression 57:6,8 57:11 deputy 5:19 21:19 22:3 23:17 26:4 30:15 41:2 76:6 described 81:16 description 3:9 4:8 detail 52:18 77:14 detective 45:9,10 determine 28:19 diagnosed 62:17 83:23 diane 56:15,16 diary 60:17 73:24 died 9:1 45:17 48:11 62:22 different 10:1 11:5 16:20 17:2 31:10 31:12 47:13 51:16 53:24 54:11 55:10 55:12 65:1 68:14 69:24 70:14 74:16 75:11,22 dirty 64:1,7 disability 47:8,9 47:14 60:6 disaster 22:11 discovery 48:22	dismissed 88:11 disorder 83:24 district 1:1,1 75:20 dmacmain 2:11 doa 9:8 docket 1:6 doctor 56:3,8,11 56:17,19,20 57:1 documents 4:7 doe 41:11 51:19,21 51:23 dog 56:4 doing 70:13 82:21 door 17:1 18:16 36:20 87:16 downtown 58:18 drank 67:23 dream 60:16 62:14 dreams 60:18 drink 7:12 drinking 67:5 driver 47:12,24 dropped 18:15 19:3 87:13,14,24 drowned 43:20 46:20 drug 12:12 17:22 62:18 drugs 35:9 40:15 50:21,23 63:1 64:5,6,9,11 68:2,8 drunk 47:12 due 30:11 duly 5:9 89:5	earlier 7:22,24 42:21 71:11 75:17 early 17:12 21:11 earning 64:19 70:3 eastern 1:1 eat 67:6,7 economic 59:5,6 59:16 60:12,13 62:8,9 64:18 eight 40:11 44:7 59:12 60:11 62:24 either 9:1 26:2 40:18 68:2 71:5 78:16 81:3 83:4 electrician 62:13 eloped 84:16 eloping 65:10 emotional 17:17 56:4 57:7 employed 47:7,23 49:10,13 employment 55:4 55:16 70:4 encounters 31:3 ended 63:24 70:11 ends 70:8 enforcement 21:19 23:7 24:5,7 24:12 25:6,9,20 enforces 36:20 engage 70:13 engaged 48:2 entered 39:19 entire 60:21 ephrata 1:8 2:18 10:11 15:20 26:2 43:10 55:2,6,11 76:23 79:6,14,15 79:21 80:16,20 81:9,17,18 84:23
		e	
		e 2:1,1 3:1,8 20:18 20:18 51:21 61:17 61:17 89:1,1	

equipment 83:11 83:15 eric 2:3 ericshore.com 2:6 escape 11:4,9 escaped 10:11 11:7 13:5 esquire 2:3,9,9,15 established 39:20 estate 1:3 48:7,18 55:21 estimate 7:15 everybody 19:10 28:20 61:4 everybody's 85:4 evidence 28:15,19 38:4,11,18,18,20 39:14,20 43:2 46:22 ex 18:15,18 22:9 23:1 25:22 87:15 88:3,8 exact 27:22 59:13 exactly 11:10 49:19 52:6 79:23 86:14 examination 5:12 79:1 87:2 examined 5:10 exception 7:17 excused 88:17 exhibit 3:10 29:3 expenses 60:10 experts 28:18 explain 64:9 explained 6:4	facility 18:11 19:1 40:17,20 50:12,15 51:13,15 57:15 63:12 65:11,13,23 66:2,20 fact 34:20 41:20 44:23 facts 43:2 factual 28:19 29:23 30:1 fall 9:24 46:19 family 25:8 56:17 56:19,20 57:1,20 57:21 58:1,14 73:13,14 far 19:19 69:18 father 18:19 fault 27:8 feel 7:15 61:2 feet 28:9 fell 24:21 26:19 86:2,5 female 72:22 82:9 82:16,19 83:3 females 83:7 fentanyl 69:2 fiance 15:5 fiancé 14:8,10,19 16:2,8,11 17:3 47:23 fight 12:7 13:5 35:23 fighting 34:8 figure 32:7 55:20 75:7 file 70:20 filed 30:2 filing 5:4 8:23 25:24 26:6 final 8:7	financial 59:18 financially 59:21 find 50:14 fine 6:2 12:20 74:12 78:3 79:10 finer 49:5 finish 7:3,5 14:19 17:13 32:5 40:5 62:11,15 finished 53:22 fire 9:6 22:8 24:2 72:3 fireman 22:7 firemen 71:20 first 26:14 40:8 62:2,17 64:24 65:22 71:23 83:18 83:23 88:7 firsthand 80:20 81:14 83:2 five 50:2,3,20 55:4 55:14 58:16 70:5 flagger 47:11 fled 10:18 50:11 fleeing 10:16 23:7 26:4 flight 23:17 focus 82:15 folks 24:10 follow 70:1 87:1 follows 5:10 food 59:20 60:4 foregoing 89:12 forget 77:8 forgot 55:7 78:14 form 5:6 11:22 44:15 forth 6:8 25:18 found 9:8 four 9:18 22:18,19 26:5 27:24 28:5,9	38:15 44:9 47:12 49:19,24 50:2,3 55:4,14 70:5 85:7 85:16 fresh 7:12 69:12 fried 67:8 friend 22:23 73:3 friends 19:9 23:1 73:17 front 29:6 42:4 fugitive 30:12 full 5:14 funeral 59:8,9,11 60:10 further 83:12,16 86:23 87:2 future 64:18
g			
			garber 61:18 getting 10:4 19:14 50:9 61:19 67:4 girlfriend 61:7,10 girlfriends 22:9 give 17:14 59:19 60:3 64:16 69:2 given 7:22 8:2 69:18 89:8 go 9:12,17 13:13 15:1 26:7 29:18 34:23 35:20 36:6 36:7 40:12 41:8 52:18 54:8,21 55:1,9,23 58:3,12 62:14 65:5,18 69:9 86:16 87:6 god 86:23 goes 67:14 70:12 85:8 goggin 2:15 going 5:19 6:5 7:19 9:5,10 15:12

[going - indicating]

Page 6

25:3 26:18 29:1,2 34:12 36:9 40:15 41:8 46:1,24 50:10 57:4,17 61:24 62:1,12 64:16,20 67:14 68:16 70:9 76:21 78:9 79:8 80:1,13 82:15 87:6 good 1:4,15 3:3,10 5:9,16 6:1 12:2,6 12:22 13:5 18:22 25:22 29:2,3 32:20 33:3 34:22 36:2 46:19 54:18 54:19,20 79:6 86:20,20 89:4 googled 32:16 gotten 40:23 grab 18:17 26:17 26:23 74:6 grabbed 26:21 42:3,6,12 76:7 grade 54:22 grades 55:10 graduated 54:24 graham 2:3 45:10 grahamb 2:6 grandkids 60:14 60:19,22 great 34:20 35:7 ground 32:20 group 1:16 2:8 guess 34:14 39:16 40:22 48:4 54:7 65:9 72:9 78:15 gunnett 2:12,21 5:19 21:19 26:4 30:15 76:7 guy 33:22 43:16	h h 3:8 61:17 half 45:17 63:2 85:6 hand 67:3,20 handcuffs 14:17 26:14 33:10 handful 79:11 handled 72:4 hands 27:4 78:17 78:20 happened 8:24 9:4 11:10 14:23 15:10 21:15,24 22:9 23:10,17,21 24:23 26:3,3 27:12,13,20 29:11 35:6 36:13 37:7 40:21,24 41:3,6 61:23 63:9 69:10 87:15 88:5 happening 33:16 hard 64:9,11 hardest 73:5 haven 53:22,24 he'll 35:23 head 6:22 8:9 71:1 healthy 60:21 hear 72:19 76:12 76:13,16,20 79:6 86:14 heard 9:5,7 10:1,7 10:8,12 14:15 26:1 33:19 46:2 46:13 71:11,12,17 87:23 hearing 71:20 83:18 heart 82:11 held 1:15 32:20 49:16 50:6	hello 79:3 help 9:10 38:13,15 59:19,20,22 60:3 68:21,22,24 69:3 helped 22:15 23:11 helping 46:11 hereto 30:10 heroin 17:22 50:15 64:13 69:1 69:2 hey 11:13 12:1,6 hi 79:4 high 55:1,9,12 highest 54:22 70:22 hill 9:24 26:18 41:23 history 30:12,20 30:23 55:4 70:2 87:4,5 hit 47:12 hold 37:24 holly 1:19 89:18 home 14:2 47:2 50:13 51:18 54:6 60:17 hope 63:17 hopefully 82:24 hospital 9:6,13 10:11 13:19 20:9 21:16,20 26:3 28:2,6 32:23 34:13,14,16,17 35:20,24 43:15 45:23 49:3,4 53:22 71:9 77:4,5 hotel 58:19,20 hour 7:15,24 70:4 hours 7:15 9:18 18:2	house 14:15 16:18 16:19,20,21 18:14 18:16 19:4 46:2 87:19 hundred 26:20 hurt 62:1 husband 18:15,18 25:22 88:3,8 i idea 12:2,6,22 13:5 32:1 identification 29:4 ignorant 71:19 imagine 84:18 important 31:7 84:23 incarcerated 52:5 52:9 53:3,8,11,18 inches 11:6 incident 6:7 9:1 11:8,12 12:21 13:4,19 15:21 17:19 18:23,24 19:8 26:1 30:5,6 31:8 43:7 44:24 45:11 49:11,22 51:1 57:2,3,5,12 57:22 58:2 59:24 61:8 63:12 65:12 66:4 67:16 69:9 73:12 78:10 incidents 50:20,22 income 70:22 incorrect 7:24 8:3 69:16 index 4:1 indicate 15:18 indicated 89:5 indicating 27:5 78:17,20
--	--	--	--

influence 68:1 information 6:7 6:10 8:24 9:3 26:6 31:2 39:19 41:9 46:18 79:15 80:20 81:8,14 83:3 86:15 initially 14:22 inside 21:15 26:3 instance 10:22 instruction 4:3 insurance 57:4 71:2,5 interested 89:10 internal 76:1 interrogatories 69:23 interruption 74:7 interviews 75:20 80:16 intuition 68:16 investigate 9:16 investigating 39:6	john 2:4 41:11 54:18 joke 35:23 joking 34:21,24 35:8,13,21 jump 11:3 34:12 36:9 44:10,13 46:24 jumped 11:8 33:10 37:18 38:21 39:23 40:2,6 41:5 42:16 44:12,20 82:17,20 justification 32:21 33:4	know 6:10,15,22 7:13 8:3,24 10:2,8 10:15,23,24 11:10 12:18,19 13:1,8 17:23 18:1,13 19:12,21,24 20:19 21:9 22:6,22 23:18,23 25:2,4 26:21 28:6,7,23,24 30:5,18 31:5,18,20 32:10 33:22 34:4 34:5 35:5 36:8,12 36:12,17,23 39:23 41:20 42:11,15 49:19 52:6,9 53:20 55:6 58:17 63:7 64:8 65:17 66:15,16,18 67:5 67:14,22,24 68:5,7 68:7,10 69:8,8,10 70:22 71:14,22 72:24 73:6,7 77:2 78:5 79:23 80:11 81:11 82:15 83:7 83:9 84:24 85:1,2 85:13,13 knowledge 24:8 27:14 64:4 knows 11:17 32:7 76:22 kristi 1:15 3:3 5:9 5:16,17 6:1,2,3 29:6 79:8	65:20,21 66:5,7,9 70:9 late 15:12 law 1:16,16 2:3,8 21:18 23:7 24:5,7 24:12 25:5,9,19 36:20 60:15 lawful 32:21 33:3 laws 32:16 lawsuit 6:8 8:23 26:1 29:7 55:19 lawyer 6:14 28:24 82:4 lays 29:11 leave 7:20 18:24 84:19 leaving 17:12 21:11 66:20 lebanon 51:14 53:12,13,17 57:17 57:20,20 58:1 65:21 66:6 87:14 left 6:19 17:11 18:11,13 19:5 40:17,20 50:14,17 65:22 legal 1:22 29:24 leppler 1:8 2:13 lie 78:11 life 13:16 26:23 44:5,12,20 59:18 60:15,20,21 61:3 64:21 69:3,6 71:2 72:4 lincoln 22:8 line 4:4,8,12,16 list 59:4 84:19 lititz 58:12 59:2 70:3 little 35:9 37:10,11 37:13,14 56:21
j 1:19 2:9 89:18 jail 18:5 34:23 35:20 57:9 61:24 62:1 63:13,14,15 63:21,23 69:8 71:7 76:22 84:10 84:13 jeremiah 58:9,10 jess 22:10,14,15 22:23,23 23:6 24:1 jess's 22:21 jessica 73:2 job 49:17 50:5 62:10 64:20 jobs 25:17 50:6,7 55:17	k keep 10:4 kennedy 2:4 kept 10:3 78:1 84:11 kids 60:17,23 61:2 kill 35:15 37:16 46:6 killing 40:13 kim 61:11,22,23 kim's 61:12 kin 89:10 kind 6:22 34:14 46:24 55:24 57:6 57:7 59:17 63:8 72:16 73:19,21 kinds 32:5,6 knew 8:9 11:18 17:11 26:1 30:5 30:10,15,18,22 31:2 34:22 61:24 69:3 76:21 82:16 85:11 knock 87:16 knocked 18:16	l l 20:18,18 lady 6:19 laid 83:11,14 lancaster 1:7 2:12 5:18 52:5 53:3,9 53:18 57:16,21 58:15,18 59:2	

[little - number]

Page 8

77:7,9,11,12,13 live 66:19 lived 17:2,3 living 17:7,9 19:4 19:7,11,12 25:16 54:8 55:8 60:1 llc 1:16 located 1:16 16:16 33:15 57:16 58:11 location 59:2 locations 51:17 long 7:14 47:14 56:20 61:18 longer 56:23 77:12 longest 49:16 62:21 63:1,19 64:4 70:16 look 28:18 30:24 56:13 81:4 88:12 looked 67:7 75:17 75:22 76:3,5,11 looks 9:15 15:11 87:7,8 loss 58:14 59:6,6 59:16 60:12 86:21 lost 60:7,13,14,20 60:21 62:7,8 64:17,18 82:11,12 lot 12:11 21:20 22:4 36:10,13 37:10 41:23 58:4 lots 36:19 loved 60:24 61:1,2 67:10 loves 76:23 low 13:15	44:18 69:11,14 74:11 75:3,9 78:22 86:24 87:3 88:13 machine 89:7 macmain 3:4 5:17 79:12 macmainlaw.com 2:11 mad 17:12 19:5 66:20 main 1:16 2:8,9 5:13 11:24 15:17 29:1,5 38:3 44:17 44:18 69:11,14 74:11 75:3,9 78:22 86:24 87:3 88:13 male 72:22,23 man 47:24 manheim 55:7,8 55:11 marijuana 64:15 mark 29:2 marked 4:15 29:3 market 1:17,23 2:10,16 marriage 48:5 married 48:14 60:16 61:3,19 marshall 2:15 material 30:10 matter 34:20 matters 36:18 mdwgc.com 2:17 mean 6:23 33:4 35:19 55:17 meant 8:9 74:17 medical 48:22 71:5	medication 56:9 medicine 84:11 meet 58:18 meeting 37:3 members 25:8 memory 85:14,15 mental 31:12 mentioned 23:14 23:15 34:2 63:20 83:10 met 77:17 michelle 46:10 mid 1:23 miller 72:1 mind 45:19 minutes 36:22 44:7 misdemeanor 52:15 missing 72:12,13 83:10 mistake 24:20 mistakes 37:11,11 37:13,15 molested 54:16 mom 14:2 67:11 68:10,16 monday 1:12 money 59:7,20 60:3 month 48:11 50:6 months 40:3 49:18 49:20 50:1,2 55:5 55:14 59:8 70:6 mood 34:20 mother 12:1,5 moved 55:13 multiple 41:10,19 44:3	n n 2:1 3:1 20:18 name 5:14,17 16:12,14 18:21 20:20 22:10,21 43:16 56:15,16 58:9 61:12 71:21 71:22,23,24 79:5 82:8 85:12,14 nature 29:23 near 81:10 need 7:3,11,12,12 7:12,16 17:16 69:19 needed 69:3 needs 8:1,4,10 neighbor 20:11 neighbors 14:9 15:9 neither 89:9 never 13:13 40:12 40:15,20 48:14 60:18,19 61:5 72:4 87:18 new 75:7 newell 20:15,17 news 77:19 newspaper 9:2 nice 82:1 night 22:6 38:8 nod 6:22 normal 6:15 7:2 61:3 notary 1:20 89:4 89:19 notes 74:17,20 75:14 notice 30:11 number 3:9 30:8 46:18 59:13 60:7 73:10 84:18
m			
m 43:18 mac 1:16 2:8,9 5:13 11:24 15:17 29:1,5 38:3 44:17			

[numerous - ph]

Page 9

numerous 9:22	14:12,18,22 15:8	once 35:20,22 52:7	41:23
nurse 46:4	15:18,23 16:2,8,11	53:6	part 15:9 21:6
o	16:22 17:15,15,17	ones 46:13 51:3	23:16 27:7 29:15
o 43:18 51:21	18:4,6,10 19:3,14	81:4 82:23	31:9 41:9
oath 86:17	20:1,7,10 21:2,5,9	online 10:10 31:15	particular 50:21
object 11:22 44:15	21:23 22:14,17,23	31:16,21 32:12	50:23
objections 5:5	23:3,6 24:5,15,17	opiates 31:11	particularly 21:19
obviously 63:15	24:22 25:2,5,19,24	opioid 30:11,16	parties 5:3
october 87:8	26:9,11 27:1,10,12	31:6,7	party 89:10
odd 87:7	27:19 29:1,14,16	opioids 31:14,23	partying 68:18,22
offhand 22:22	29:20 30:8,9,18	32:13	pass 46:11
23:18	31:6,18,21 32:4,15	opportunity 62:8	passed 62:12
office 26:8 38:6	32:18 33:2,12	62:9,10 64:18	65:21
45:12 75:21 78:16	34:6,12 35:1,12	80:17 86:9,16	pastor 58:4,6,8,10
officer 13:23 14:8	36:1,9,10,11,16	oral 1:15	58:13 73:14
24:16,17 25:2	37:6 39:7,17 41:8	ordinary 6:20	pay 59:7,9,19 60:3
26:12,13 34:18,19	41:18 42:5,9,12,19	originally 53:2	paying 49:5,8
35:2,13 36:24	43:1,9,18 45:2	outcome 89:10	penalty 89:11
38:7 41:20 43:10	46:17 47:9,22	outgoing 54:1,3	pending 7:20
45:7 46:9 72:12	48:21 49:1,10,16	outpatient 54:4,8	penn 2:4
78:12 79:15,18	49:24 50:3,8	outside 36:22 37:8	pennsylvania 1:1
80:4,5,8,10,11,21	51:10 52:1,4 53:2	p	1:18,24
81:6,9 82:6,9,16	54:7,20 55:14,23	p 2:1,1,15	people 6:15 9:2
83:10,11 86:8	57:5,18 58:1 59:4	p.c. 2:3,8	22:5 23:14,15,20
officer's 82:8	60:6 64:4,14,16,23	pa 2:5,10,16	27:18 32:5 33:5
85:12,14	65:15 66:8,13,16	packing 70:15	50:20 73:9,11,21
officers 33:8 34:8	66:23 67:9 68:14	page 3:9 4:4,8,12	87:18
37:2 38:22,24	68:20 69:4,11,22	4:16	perfect 78:16
44:4,11,19,24 45:2	70:12 71:8,16	pages 29:17 75:19	perfectly 78:3
46:1,13 75:22	72:2,7,14,18 73:2	83:20	period 62:21 63:1
79:21 80:4,16	73:18 74:3,12,18	paper 60:24 74:1,2	63:19,20 64:5
81:9 82:19 83:3	74:22,24 75:10,17	74:4	70:17
85:9	76:1,5,10 77:5,24	paragraph 30:8,9	periods 54:12
offices 1:16 2:3	78:8,22 79:6,20	32:18 39:17 41:9	perjury 89:11
oh 29:13 36:7	80:15,19 81:13	46:17	permission 87:20
37:16 55:6 74:18	82:1,18,22 83:2,6	parent 86:21	person 24:13
okay 5:24 6:3 7:8	83:9,20 84:2,12	park 33:18 36:19	27:19 32:1 34:5
8:5,7,19 9:14,19	85:23,24 86:3,9,19	72:13 83:13	38:10 73:2
9:23 10:6,18	88:2,13	parked 37:4	personally 55:21
11:12,18 12:5,15	old 60:20	parking 21:20	ph 77:9
13:8,11,18 14:10		22:4 36:10,13,19	

[phil - record]

Page 10

phil 53:24 philadelphia 1:24 2:5,16 philly 53:21 phone 75:4,7 physically 79:15 pick 54:5 picked 18:15 75:4 piece 22:12 64:17 74:1,2,4 82:11 place 17:2 18:1 33:18 50:23 53:17 89:5 places 47:13 plaintiff 1:5 2:6 32:19 39:18 planning 61:19 plate 67:8 playing 84:11 please 5:14 45:23 45:24 46:3 point 7:11,21 10:15 17:16 39:5 45:15 59:18 69:7 70:8 72:11 78:14 82:10,14,16 85:11 pointing 29:16 police 9:7,13,18 10:18,21 11:14,20 12:3,7,22 13:4,6 14:20 15:4,5,18 16:4,6 19:16,16 24:19 27:7,10 40:5 46:6 76:12 76:16,19,24 79:14 81:18 84:23 porch 19:22 20:24 possibility 86:7 potatoes 9:10 71:14 72:16,19	preacher 56:2 prefer 5:24 prescribes 56:11 present 2:20 14:5 14:12 21:16 27:18 28:21 79:16 80:7 80:8,21 press 77:15,17,22 78:15 pretty 12:16 66:12 previously 8:2 prior 7:23 8:5,23 10:22 11:2,4,7 12:21 13:3,19 17:18 18:7 23:16 25:24 26:6 31:3 46:21 49:14 51:1 57:1,5,12,22 58:2 58:3 63:6,12,14 66:4 priorities 84:19 prison 36:6,7 51:20 52:5 53:4 70:9 prisoner 10:11 prisons 53:8 privileged 86:15 probably 8:15 11:13 62:19 67:6 68:10 probation 21:13 65:2 88:6,9 probes 41:15 problems 12:11,12 53:21 proceedings 74:8 processive 77:9 production 4:7 profession 72:5 professional 1:20 22:12	prompted 32:23 proof 28:13 proper 84:12 property 47:20 87:10,12 protect 85:9,10 prove 50:21 51:19 provide 6:10 59:17 provided 80:15 psychiatric 53:22 psychiatrist 56:18 public 1:20 89:4 89:19 pull 22:15 pulled 22:20 36:20 85:17 pulling 13:15 23:22 40:12 pushed 39:4 pushing 39:11 put 8:3 14:17 29:6 36:21 37:1,5 62:4 77:18 78:5,12,13 puts 31:11	quite 59:9
			r r 2:1 61:17 89:1 radio 71:12,17 72:10,20 76:14 83:11 ran 13:4,4 14:15 14:16 21:2 33:17 33:19 34:9 39:18 41:2 61:22 65:5,8 65:20,21 66:10 rapids 13:15 ray 36:4 rays 28:1 reach 26:17 78:21 reached 26:21 27:3 read 13:22 14:1 27:16,22 31:13,21 37:7,18 43:6,9,12 43:15,19,21,23 44:3,8,11,19 85:3 86:12 reading 5:3 9:2 31:9 66:14 real 54:17 realize 7:22 8:2 really 19:24 64:9 71:19 82:14 reason 7:16 32:4 32:20 33:3 50:14 recall 45:20 46:5,8 46:9 73:11 74:3 82:5 receipts 59:14 received 51:7 55:24 84:8 receiving 87:10,11 recess 69:13 record 5:15 8:4,11 89:8

[recorded - service]

Page 11

recorded 89:7 recording 76:18 records 83:21 recover 23:11 recovery 72:7 73:5 recyclables 53:16 recycling 87:15 reed 61:14 referring 72:15 74:22 regarding 20:10 20:22 43:7 region 1:23 registered 1:20 regularly 56:3 rehab 17:12,13,18 17:21,24 18:8,24 19:5 21:11 40:14 40:17,20 49:12 50:11,14,19,20,24 51:19 53:20,20 60:18 63:11,24 64:24 65:11,23 66:1,20 84:16,19 rehabs 65:1 relapsing 50:16 related 6:10 relation 18:6 33:15 49:21 63:3 81:22 relationship 61:18 remember 12:13 13:12,13,17 18:1,2 26:7 32:3 45:9,13 52:13,16 55:18 56:16 82:8,9 rent 59:19,23 60:4 rental 47:20 repeat 8:21 rephrase 6:16 44:17	report 43:12,15,21 43:23 44:8 86:10 reporter 1:20 7:6 8:10 reports 13:22 15:18 27:16,20 28:20 34:2 37:7 37:18 43:6,9 44:3 44:19 75:21 represent 5:18 79:5 request 4:7 requested 89:9 rescue 23:4 24:1 rescuer 22:10 23:2 reserved 5:6 reside 47:19 respective 5:3 response 11:16 12:9,13,15 13:1,9 42:22 67:17 restroom 7:13 result 56:1 retired 58:15 returns 70:20 review 76:2 86:10 89:9 reviewed 29:22 rhee 61:13,15 right 6:19 11:7 14:24 19:13 21:3 24:11 32:14 35:14 36:20,21 37:1 39:1 42:4 53:5 54:10 57:3 58:9 58:17,18 63:5,9,18 64:2,22 65:5,6,14 66:6 71:22 75:16 79:9 81:15 82:9 83:14 84:21 88:1	ring 62:6 risk 44:5,12,19 rivera 43:10 82:6 82:7 robert 18:22 25:22 54:19,20 rodriguez 1:7 rogers 14:8 34:18 35:13,16,18 row 56:7 run 10:21 11:13 11:20 12:2,22 27:1,4,10 40:5 42:9,14 51:8,16 52:3 65:17 66:1,5 78:7,9 running 14:19 15:4 16:3 19:15 21:18 22:3 27:7 41:22 65:9 s s 2:1 3:8 43:18 sack 9:9,9 71:13 72:16,19 safe 80:19 safety 79:19 santana 1:7 41:11 41:21 save 26:23 44:5,10 44:13,21 45:18 46:11,14,16 82:24 savings 47:6 saw 9:24 14:19 15:6,9 16:3,9,10 20:2,3 28:12 32:11 42:21 48:21 79:24 80:12,13 saying 38:23 45:16 46:10 74:20 88:11 says 30:9 31:22 39:18 41:9 46:18	59:5 62:8 70:12 scanner 9:5,8 10:7 10:9,10 schmidt 24:16,17 24:18 25:2 38:7 80:5,8 81:2,3 school 54:5 55:1,9 62:11 schools 55:12 scraped 33:7 scream 33:19 sealing 5:4 search 83:12,15 second 17:14 47:1 64:16 security 43:16 see 9:21 14:14,22 21:22 27:19,23 37:21 50:10 56:2 57:11 78:19 82:8 seeing 10:3 50:12 seek 84:15 seeking 6:12 55:20 59:6 seen 9:20,21 14:16 26:16 29:8,10,15 29:19 33:6 41:21 72:4 77:7 80:24 81:6 sees 15:1 sending 74:18 sense 6:14 10:5 26:17,22 71:18 75:12 78:2 85:6 sent 69:23 74:16 74:17,20 75:4,14 75:19 83:20 september 89:12 serve 85:9 service 50:4
---	--	---	---

[services - tackled]

Page 12

services 70:11,13 session 6:5 set 18:5 shackle 78:2 shackled 46:20 shackles 26:14 78:2,4,5,14,15,18 shake 56:5 shawn 20:15,16,21 33:12,15 34:7 sheets 29:17 shepherd 45:10 80:5 81:3 shepherd's 57:13 57:14 58:2 sheriff 21:19 26:4 30:15 36:3 76:7 sheriff's 5:18 22:3 23:17 41:2 76:2 shook 8:9 shore 2:3 short 69:12 shorthand 89:7 shortly 45:10 shot 27:24 81:11 85:3 shoulders 6:22 shoved 32:19 33:3 33:8 show 29:1 77:23 showed 77:22 79:17,22 shrug 6:21 side 11:6 25:17 55:17 86:5 signature 89:18 signed 48:12 signing 5:3 simo 43:18,18 simple 12:16	simply 28:14 single 70:23 situation 31:12 six 59:12 60:11 sleep 56:6 sleeping 87:17 slipped 24:21 slipping 35:10 smoked 64:15 snuck 50:15 solutions 1:22 somebody 9:10 19:11 27:24 31:14 31:23 32:9,11,12 37:1 39:4,11 46:15 50:15 69:2 71:12 78:3 85:21 son 6:6 9:1,22 10:16,18 11:13 27:7 31:4 34:8 37:14 38:12,21 39:8,14 43:19,24 44:6,13,21 45:17 45:21 46:6,12 50:24 59:17 78:6 79:16,20 80:21 81:22 82:12 83:16 83:23 son's 30:19 37:13 56:1 sorry 12:14 15:16 16:12 17:14 22:22 26:24 32:3 38:1 52:16 54:2,20 55:7 57:24 58:10 74:9,13 75:8 81:21,23 82:2,3 86:20 sort 18:7 48:23 source 9:3	space 65:4 span 63:4 speak 35:2 speaking 10:8 45:9 73:12 special 69:10 specialty 49:13,18 specific 59:17 75:19 79:13 specifically 15:10 30:14 43:1 72:18 spell 61:16 spirits 34:23 36:2 spoke 16:2 23:20 24:10,19 35:2 56:2 73:10 spoken 14:4,7 22:2 34:15 spotted 80:1 standing 79:24 80:6 89:4 start 78:13 started 28:4 57:4 58:4 62:13,19 starts 29:7 state 5:14 31:12 71:6 statement 85:4 statements 75:21 85:6 states 1:1 station 24:20 status 30:12 stayed 66:6 staying 17:4,6 stays 53:24 stick 64:17 stipulated 5:1 stipulations 4:11 stolen 87:10,11	stone 34:19 35:2,3 35:21 36:2 78:12 stood 36:21 stop 56:6 stopped 9:6 44:9 stories 10:2 straight 37:5 street 1:17,23 2:10 2:16 14:16 struck 87:7 struggling 62:20 64:10 stuff 18:17 20:5 54:21 71:17 successfully 40:8 suicidal 45:21 suicide 69:6 suit 26:6 38:19 suite 1:17,23 2:4 2:10,16 supervision 89:7 support 4:1 41:14 56:4 59:18,20 supposed 18:10 26:13 31:10,14,23 32:12 37:1 sure 6:3,24 15:20 41:22 48:13 53:4 56:14 58:11 63:6 68:9,19 69:8 74:12 80:11 sustain 38:19 swim 28:7 sworn 5:9 89:5
			t
			t 3:8 89:1,1 table 85:18,19,21 85:22 tackle 16:6 tackled 14:16 15:5

[take - transmissions]

Page 13

take 6:23 7:6,18 17:16 42:8 45:24 50:16 56:9 69:3,5 69:12 71:7 78:12 taken 5:21 32:23 34:13 61:5 69:13 89:5 talk 6:14 7:9,19 24:13 45:23 58:4 85:10 talked 22:5,7,8 26:12 32:22 34:18 35:14 37:2 55:3 58:13 71:20 72:10 73:3,15,16 76:6 86:13 talking 9:2 15:10 15:21 29:24 32:8 35:11 36:22 46:9 68:21 69:4 76:19 77:20 82:9 talks 62:7 64:18 tase 9:21 26:13 31:10,14,23 82:23 tased 10:4 26:22 28:10 32:19 33:10 41:10 42:20 46:19 81:9 83:3 85:12 85:13,21 86:1,1,4 taser 25:11 27:21 32:12 38:15 41:15 86:2 tasered 25:13 28:16 33:3 41:18 42:3,21 43:3,13,20 43:24 tasers 16:10 19:17 20:3 22:19,19 27:24 28:1,2,4,5,8 28:10 31:17 38:16 81:12 85:3,7,17,20	tasing 26:24 32:16 74:5 tax 70:20 tech 54:24 62:15 62:16 telephonic 74:7 tell 11:13 12:5 20:1,21 24:18 34:7 35:18 36:5 38:4 40:14 55:23 59:13 69:11 76:23 89:6 telling 13:13 33:20 34:21 45:20 46:5 68:20 temp 50:4,7 70:10 70:13 tempforce 70:12 temps 70:18 ten 57:9 term 61:18 terms 6:15 21:15 21:18 27:12,13 34:12 36:9 43:1 46:24 47:1 48:7 terribly 7:14 terrified 13:14,16 40:10,11 testified 5:10 87:19 testify 86:11 testifying 86:17 testimony 3:3 89:5 89:6,8 text 74:19 texting 75:1 thank 86:22 88:14 thanked 44:23 45:3,18 82:20 thankful 46:15	thanks 46:11 theft 52:15,15,17 87:9,12 theories 32:6 theory 28:15 42:19 86:3 thereof 89:10 thing 7:2 8:7 13:12 20:23 27:22,24 35:19 36:17 40:8 72:9 77:23 78:2 85:1,8 things 12:10 24:11 26:5 29:21 31:10 32:6 69:24 70:14 72:14,16 74:16 87:17 think 7:14 8:18 23:23 37:14 41:13 41:15,18 42:13 43:5 45:6 48:20 52:13,14 53:2,16 55:15 57:3,19 58:9 60:12 65:10 69:19 70:24 71:7 71:21,23 72:15 74:14 75:3 76:6 79:12 80:4 83:21 84:22 thought 45:21 48:21 53:19 68:23 69:16,17 70:5 74:9,18 three 11:6 27:4 28:9 33:5,8 36:22 44:9 51:3 53:23 53:24 54:11 60:16 65:3 till 44:9 time 5:7 6:13 7:7 7:11 15:15 17:8	18:11,23 19:7 40:9 45:15,19 48:5 49:10 52:20 54:11 55:8 59:24 60:7 61:7 62:2,21 63:1,4,19,23 64:5 65:22 68:7 70:17 71:2 72:9 75:13 76:9 78:18 84:5,8 89:5 times 9:22 10:21 26:21 27:4 30:9 41:10,19 44:9 52:4 53:3,23 57:9 66:1 today 82:4 86:11 86:17 told 12:1,9,13 13:3 16:3 22:10 26:13 30:4 33:13 36:2 36:14 37:2,3,10,23 38:6,8 39:5,7 40:10 45:23 46:3 46:4,5,6 50:18 62:4 64:19 67:10 67:12 71:11 73:9 73:10 76:11 79:24 80:3,12,23 81:1,5 tomorrow 82:7 tons 37:12 top 33:10 73:8 total 59:10 touch 57:13,14 58:2 tragic 81:22 transcribed 89:7 transcript 89:9 transcription 89:8 transmissions 71:12
--	--	--	---

[transported - witnessing]

Page 14

transported 77:3 treat 84:2 treated 84:4 treating 84:5 treatment 34:15 51:7 54:9 57:6 84:9,12,15 trespassing 52:11 52:12 trial 5:7 trick 6:9 tried 35:15 46:14 46:15 65:17 66:9 66:14 69:5 trouble 37:12 49:15 65:7 trout 73:2 true 30:2 89:8,12 truly 86:20 truth 89:6,6,6 try 7:9 8:21 34:10 44:5,13,20 46:11 65:1,4,15 69:6 trying 6:9 26:7 32:6 40:3 45:18 50:14 55:19 65:12 67:11,12 70:24 74:14 75:6 85:10 turn 29:22 30:8 75:6,7 tv 6:9 35:21 41:21 77:10,13 twice 85:22 two 2:4 7:15 18:2 28:1,7,10 35:14 36:19 48:11 49:23 49:24 51:16 55:12 56:24 59:8 61:20 63:5 66:3 73:15 80:5 81:11 82:19 83:7,22 85:3,5,14	85:20	w	weekend 65:9 83:22 weeks 35:4,14 56:7 wellspan 56:15 went 9:6,12 20:4 23:10 27:13 38:5 38:7,12,14 39:3,14 39:21 40:14 41:23 44:4,7 46:13,14 51:11 57:13,19 59:7 62:2,15 63:20 77:13 79:12 79:16 80:7,9,21 81:1,7 82:24 83:7 83:7,21 84:10 87:16 west 1:17,17 2:10 2:10 whatsoever 9:3 27:14 38:11 39:14 46:22 72:5 81:19 white 51:8,16 52:1 52:3 65:17 66:5,9 whitman 14:11 16:13,15 wife 60:23 wished 85:11 witness 15:16,23 21:20,23 22:3,14 23:6,9,16,21 38:1 38:12 74:9 75:6 86:22 88:17 witnessed 19:15 20:12,21 21:6 22:6,18 25:3 33:23 witnesses 28:12 41:14 witnessing 16:17 19:20
	u	w 20:18 wait 15:14 82:1 waited 79:18 waived 5:5 walk 63:8 wallet 20:6 want 6:9,16 7:19 12:18 15:20 17:7 17:9 19:4 29:20 30:14 34:23 35:19 36:6,7 50:16 61:1 61:2,2,2,3,23 62:1 66:11 76:22 86:14 wanted 17:12 35:5 46:10 60:15,23,23 62:11,11 65:5,6 67:6 69:17 70:1 wanting 68:22 wants 68:20,24 warner 2:15 watch 26:10,20 46:3 watched 26:20 44:8 78:13 watching 10:3 35:21 85:20 water 13:15 22:16 23:10,11,22 25:3 39:19,21 46:14 80:7,9,14 81:7 82:17,20,24 83:8 86:1,2,4 way 7:24 33:5 69:20 72:10 78:16 83:13 87:21 we've 65:3 week 19:2 45:17 65:11 66:8,21 70:18,19	
	unconscious 46:19 understand 6:16 10:1 33:5 37:4 39:13 48:13 74:14 82:13 unintentional 69:5 unit 69:10 united 1:1 unlawful 87:9,12 ups 87:1 urine 64:1,7 use 6:15,15 7:12 40:15 65:10 usually 30:24	v	
	v 1:6 vazquez 56:16 verbal 6:18,24 7:1 8:8 veritext 1:22 victory 58:8,11,13 58:15,16,23 59:1 video 9:21 10:3 21:22 26:16,20 41:22 76:6 77:7 77:20 79:17 82:15 85:20 videos 26:10 view 31:8 violation 21:12 vo 54:24 62:15,16 vodka 67:3,20,22 voice 72:22,22,23 76:13,16 volunteer 24:2		

[woods - younger]

Page 15

woods 28:8 80:1 85:19 word 65:10 wording 29:24 words 35:5,7 38:22 work 24:5,11 60:8 70:2 worked 24:2,7 25:5,9,19 50:4 70:3 78:2,16 working 40:16 47:11 49:9 55:15 59:22 70:10 works 23:4 47:24 worse 57:10 worst 72:6 written 73:18 wrong 15:13 wrote 31:18 32:10 73:21 74:3,13	yelling 87:19,23 young 6:19 54:17 younger 54:15
x	
x 3:1,8 28:1 36:4	
y	
yeah 21:4 27:3 29:15 32:16 36:7 37:16,23 39:16 42:4 44:7 45:12 45:15 47:6 49:3,7 52:3,22 55:11 57:8 58:23 59:22 62:23 63:10 64:8 67:19 73:5,20 84:4 year 11:2 49:23 56:21 63:2 70:23 years 56:24 60:7 60:20 61:20 62:24 63:6 85:5,14	

Commonwealth of Pennsylvania Rules of Civil

Procedure

Title 231, Chapter 4000

Depositions and Discovery

Rule 4017

(c) When the testimony is fully transcribed a copy of the deposition with the original signature page shall be submitted to the witness for inspection and signing and shall be read to or by the witness and shall be signed by the witness, unless the inspection, reading and signing are waived by the witness and by all parties who attended the taking of the deposition, or the witness is ill or cannot be found or refuses to sign. Any changes in form or substance which the witness desires to make shall be entered upon the deposition by the person before whom it was taken with a statement of the reasons given by the witness for making the changes. If the deposition is not signed by the witness within thirty days of its submission to the witness, the person before whom the deposition was taken shall sign it and state on the record the fact of the waiver or of the illness or absence of the witness or the refusal to sign together with the reason, if

any, given therefor; and the deposition may then be used as fully as though signed, unless the court holds that the reasons given for the refusal to sign require rejection of the deposition in whole or in part.

DISCLAIMER: THE FOREGOING CIVIL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY. THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE STATE RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.